

**Chemtool, Inc.**

# **Spill Prevention Control and Countermeasure Plan**

**Project No. 18-882**

**September 2019**

**FEHR GRAHAM**  
ENGINEERING & ENVIRONMENTAL

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**221 East Main Street, Suite 200  
Freeport, Illinois 61032**

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**Prepared for:**  
**Chemtool Inc.**  
**1165 Prairie Hill Rd.**  
**Rockton, Illinois 61072**

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## **Part 1: Ready Reference Materials for an Emergency**

### **Emergency Information**

#### **Facility Owner, Address, and Telephone:**

Chemtool Inc.  
1165 Prairie Hill Rd.  
Rockton, Illinois 61072  
(815) 957-4140

#### **Facility Operator, Address, and Telephone:**

Chemtool Inc. (Hereinafter referred to as: Facility)  
1165 Prairie Hill Rd.  
Rockton, Illinois 61072  
(815) 957-4140

#### **Facility Contacts:**

Sean Stadler, Operations Manager, Chemtool  
Spill Prevention and Emergency Coordinator - Primary  
(815) 389-0177 - Office

(b) (6)

Josh Turnbull, Manufacturing Manager, Rockton  
Spill Prevention and Emergency Coordinator - Alternate  
(815) 389-0178 - Office

(b) (6)



## Emergency Use Index

### Emergency Reporting and Coordination

National Response Center (NRC)	(800) 424-8802
Rockton Fire Protection District - Emergency	911
Rockton Fire Protection District - Non-Emergency	(815) 624-6010
Rockton Police Department - Emergency	911
Rockton Police Department - Non-Emergency	(815) 624-4351
IEMA Spill Reporting	(800) 782-7860
Winnebago County Emergency Management	(815) 319-6313

### Emergency

Medical Emergency	911
Beloit Health System	(608) 364-5011
Spill Cleanup Contractor	
HEPACO (Formerly Trans Env)	(815) 885-4840 - 24

### Emergency

Environmental Consultant	
Fehr Graham Freeport Office	(815) 235-7643 or
Fehr Graham Freeport Office	(815) 394-4700

### Emergency Pollutant Hazards Reporting Information

National Response Center (NRC)	(800) 424-8802
USEPA Region 5 Emergency Response Center	(312) 353-2318

See Appendix J for information regarding Federal and State Spill Reporting Requirements.

## Spill Response, Containment, and Countermeasures

Time Frame	Spill Control	Procurement	Damage Control
<b>Immediately</b>	<ol style="list-style-type: none"> <li>1. Construct containment area or pump out dike area with transport or fuel oil truck into tank.</li> <li>2. Close off drains with plastic covers and sandbags.</li> </ol>	Notify the SPCC Coordinator - See Appendix F for a list of key contact personnel.	Attempt to shut off source of spill if it is safe to do so.
<b>First Hour</b>	<ol style="list-style-type: none"> <li>1. Use absorbents and dispersants.</li> <li>2. Pump into transports.</li> <li>3. Construct and revise containments.</li> </ol>	Order or make special arrangements for special damage control materials and supplies.	Notify spill cleanup company.
<b>Next 2 Hours</b>	Construct and revise containment devices to supplement equipment already in place.	Bring in additional equipment and staff as necessary.	Start cleanup procedure and employ special repair services, if needed.
<b>Next 6 to 12 Hours</b>	Repair and/or maintenance of the area.	Support continued needs as necessary.	Finish cleanup and return Facility to operation as quickly and safely as possible.

**In case you have a release of oil or petroleum product, the following is what you must do:**

Call the Spill Prevention Control and Countermeasure (SPCC) Coordinator or their designated representative at one of the numbers provided on the key personnel/Emergency Contact List provided in Appendix F.

The SPCC Coordinator or Representative will then contact the Chemtool Inc. Management Personnel.

Any release of petroleum products must be reported immediately to the proper state and federal agencies. A release is defined as enough product/material to cause a sheen upon water that has escaped the building or containment structures. Oil products reaching soil would be considered a release.

**Remember:**

Employees must report all spills to the SPCC Coordinator regardless of how small it is, how it occurred, or where it occurred.

If the site requires extensive spill cleanup beyond the company's ability, call a spill response contractor for assistance. Things to remember:

1. Safety of personnel in the area.
2. Containment of the spill.
3. Protection of waterways.
4. Possibility of an explosion. Have Fire and Police Department on-site before attempting to move any involved equipment.
5. Do not let anyone close to the spill area with smoking material, open flame, or electronic equipment if vapors are present.

**Spill History**

Description of Spill	Date of Spill	Corrective Actions Taken	Plan for Preventing Recurrence

## Part 2: Introduction and Plan Administration

### 2.1 Introduction and Purpose

The purpose of this Spill Prevention, Control, and Countermeasure (SPCC) Plan (Hereinafter referred to as "Plan") is to describe measures implemented by Chemtool Inc. to prevent oil discharges from occurring, and to prepare Chemtool Inc. to respond in a safe, effective, and timely manner to mitigate the impacts of a discharge.

This Plan has been prepared to meet the requirements of Title 40, *Code of Federal Regulations*, Part 112 (40 CFR Part 112). The definitions contained within 40 CFR 112.2 are hereby incorporated into and made part of, this SPCC Plan. It is noted that a "bulk storage container" includes any container used to store oil and requires discrete secondary containment. Oil-filled electrical, operating, or manufacturing equipment are excluded from needing secondary containment.

In addition to fulfilling requirements of 40 CFR Part 112, this SPCC Plan is used as a reference for oil storage information and any required tank integrity records, as a tool to communicate practices on preventing and responding to discharges with employees, as a guide to Facility Inspections, and as a resource during emergency response.

Chemtool Inc. management has determined this Facility does not pose a risk of substantial harm under 40 CFR Part 112, as recorded in the "Substantial Harm Certification" included in Appendix B of this Plan.

This Plan provides guidance on key actions that Chemtool Inc. must perform to comply with the SPCC rule:

- Complete monthly and annual site inspections as outlined in the Inspection, Tests, and Records section of this Plan (Part 3.11) using the Inspection Checklists included in Appendix C.
- Perform preventive maintenance of equipment, secondary containment systems, and discharge prevention systems described in this Plan as needed to keep them in proper operating conditions.
- Conduct annual employee training as outlined in the Personnel, Training, and Discharge Prevention Procedures section of this Plan (Part 3.12) and document on the log included in Appendix D.

- If either of the following occurs, submit the SPCC Plan to the EPA Region 5 Regional Administrator (RA) and the Illinois EPA <sup>(1)</sup>, along with other information as detailed in the Spill Reporting section of this Plan (Part 3.6):
  - The Facility Discharges more than 1,000 gallons of oil into or upon the navigable waters of the U.S. or adjoining shorelines in a single spill event; or
  - The Facility Discharges oil in quantity greater than 42 gallons in each of two spill events within any 12-month period.
- Review the Plan on an annual basis. Update the Plan to reflect any “administrative changes” that are applicable, such as personnel changes or revisions to contact information, such as phone numbers. Administrative changes must be documented in the Plan Review Log (Appendix E) of this Plan, but do not have to be certified by a Professional Engineer.
- Review the SPCC Plan at least once every five (5) years and amend it to include more effective prevention and control technology, if such technology will significantly reduce the likelihood of a spill event and has been proven effective in the field at the time of the review. Plan amendments, other than administrative changes discussed above, must be recertified in the Professional Engineer Certification section (Part 2.2) of this Plan.
- Amend the SPCC Plan within six (6) months whenever there is a change in Facility design, construction, operation, or maintenance that materially affects the Facility’s spill potential. A Professional Engineer (PE) must recertify the revised Plan.

*(1) Note: IEMA’s Spill Reporting Requirements are more stringent than those of the EPA. Summary information on Illinois’s Spill Reporting Requirements is provided in Appendix J.*

#### 2.1.1 Requirement to Prepare and Implement a Spill Prevention, Control, and Countermeasure Plan. (40 CFR 112.3(a-c))

Chemtool Inc. is an onshore facility subject to this part and is not an oil production facility. The Facility does not meet the definition of a farm.

The Facility was in operation on or before August 16, 2002. It has maintained its Plan and has amended it, if necessary, to ensure compliance with this part.

This Facility is not mobile or portable.

## **2.2 Professional Engineer Certification (40 CFR 112.3(d))**

A Registered Professional Engineer is familiar with the requirements of Part 112 of Title 40 of the *Code of Federal Regulations* (40 CFR Part 112), has visited and examined the Facility, and/or has supervised examination of the Facility by appropriately qualified personnel. The Registered Professional Engineer has attested that this Spill Prevention, Control, and Countermeasure Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and the requirements of 40 CFR Part 112 and procedures for required inspections. The Professional Engineer Certification is included in Appendix G of this Plan.

## **2.3 Location of SPCC Plan (40 CFR 112.3(e-g))**

In accordance with 40 CFR 112.3(e), a complete copy of this SPCC Plan shall be made available at the Facility for on-site review by representatives of the U.S. Environmental Protection Agency or the Illinois EPA during normal working hours.

The Facility does not meet the requirements for a Tier I or Tier II qualified Facility as noted in 112.3(g) in that it:

1. Has an aggregate aboveground oil storage capacity of greater than 10,000 gallons; or,
2. Has a single aboveground oil storage container with a capacity greater than 5,000 gallons; or,
3. Has had a single discharge as described in 112.1(b) exceeding 1,000 U.S. gallons or a discharge as described in 112.1(b) each exceeding 42 U.S. gallons within any 12-month period in the three (3) years prior to becoming subject to this part.

## **2.4 Spill Reporting to Regional Administrator (40 CFR 112.4)**

If Chemtool Inc. were to discharge 1,000 gallons of oil or petroleum products in a single event, or if the Facility were to discharge more than 42 gallons of oil in each of two (2) events within 12 consecutive months, the release(s) must be reported in writing to the Regional Administrator, Region V, EPA within 60 days. The report must include (Using Appendix J):

1. Name of Facility.
2. Name(s) of the owner or operator of Facility.
3. Location of Facility - including phone number.
4. Date and time of spill and/or release.
5. Type and source of material released.
6. Total quantity of material released and description of all affected medias.
7. The cause of such discharge as described in 112.1(b), including a failure analysis of system or subsystem in which the failure occurred.
8. Damage or injuries as a result of the release.
9. If evacuation was required, provide details.
10. Maximum storage or handling capacity of the Facility and normal daily throughput.
11. The corrective actions and countermeasures taken, including an adequate description of equipment repairs and replacements.
12. Description of the Facility, including maps, flow diagrams, and topographical maps as necessary.
13. Additional preventive measures taken or contemplated to minimize the possibility of recurrence.
14. Other information as the Regional Administrator may reasonably require pertinent to the Plan or discharge.

Chemtool Inc. understands that after reviewing the written report, the Regional Administrator may require the owner/operator of the Facility to amend the SPCC Plan under Section (d) if it is deemed necessary to prevent and contain discharges of oil from the Facility. In accordance with Section (e), any said amendments are to become part of the Plan 30 days after notice and implemented within six months after the effective date of the amendment. The company further understands that provisions for an appeal of the Regional Administrator decisions are contained in 40 CFR 112.4 (f).

## **2.5 Plan Review (40 CFR 112.5)**

### **2.5.1 Changes in Facility Configuration (40 CFR 112.5(a))**

In accordance with 40 CFR 112.5(a), whenever there is any change in the Facility design, construction, operation, or maintenance that materially affects the Facility's potential for an oil discharge, including, but not limited to:

- Commissioning or decommissioning of containers;
- Reconstruction, replacement, or installation of containers or piping systems;

- Construction or demolition that might alter secondary containment structures; or
- Changes of product or service, revisions to standard operation, modification of testing/inspection procedures, and use of new or modified industry standards or maintenance procedures.

Amendments to the Plan made to address changes of this nature are referred to as technical amendments and will be certified by a Professional Engineer.

Qualified Chemtool Inc. personnel may make non-technical amendments and may record these amendments in Appendix E. Non-technical amendments include the following:

- Changes in the name or contact information (i.e., telephone numbers) of individuals responsible for the implementation of this Plan; or
- Changes in the name or contact information of spill response or cleanup contractors.

Chemtool Inc. will make the needed revisions to the SPCC Plan as soon as possible, but no later than six (6) months after the change occurs. The Plan will be implemented as soon as possible following any technical amendment, but *no later than six (6) months* from the date of the amendment. Chemtool Inc. management is responsible for initiating and coordinating revisions to the SPCC Plan.

#### 2.5.2 Scheduled 5-Year Plan Reviews (40 CFR 112.5(b))

In accordance with 40 CFR 112.5(b), Chemtool Inc. reviews this SPCC Plan at least once every five (5) years. Revisions to the Plan, if needed, are made within six (6) months of the five (5) - year review. A registered Professional Engineer certifies any technical amendment to the Plan, as described above, in accordance with 40 CFR 112.3(d). This Plan is dated September 2019. The next Plan review is, therefore, scheduled to take place on or prior to September 2024.

Scheduled reviews and Plan amendments are recorded in the Plan Review Log located in Appendix E. This log must be completed even if no amendment is made to the Plan as a result of the review. Unless a technical or administrative change prompts an



earlier review of the Plan, the next scheduled review of this Plan must occur by *September 2024*.

**2.6 Qualified Facility Plan Requirements (40 CFR 112.6)**

Not Applicable. Facility does not meet the qualified Facility criteria, as noted in 112.3(g)(1) for self-certification because they have an aggregate aboveground storage capacity of greater than 10,000 gallons of oil.

## Part 3: General Requirements for SPCC Plan

### General Facility Information

Facility Name:	Chemtool Inc.
Facility Address:	1165 Prairie Hill Rd. Rockton, Illinois 61072
Property Owners:	Chemtool Inc.
SPCC Coordinator:	Sean Stadler Operations Manager, Chemtool (815) 389-0177
Environmental Consultant:	Fehr Graham 221 East Main Street, Suite 200 Freeport, Illinois 61032 (815) 235-7643
Location:	The Facility is located in Rockton, Illinois in the SE 1/4 of Section 12, Township 46N, Range 1E, Winnebago County, Illinois. The Facility is bordered by the following:
East:	Residential Property
West:	Wetland/ River
North:	Agricultural/Industrial Property
South:	Residential/Commercial Property
Nearest Navigable Waters:	Rock River

### 3.1 Management Approvals (40 CFR 112.7)

Chemtool Inc. is committed to preventing discharges of oil to navigable waters and the environment, and to maintaining the highest standards for spill prevention control and countermeasures through the implementation and regular reviews and amendments of this Plan. Chemtool Inc. has committed the necessary resources to implement the measures described in this Plan. This SPCC Plan has the full approval of Chemtool Inc. management. Management approvals are included in Appendix G of this Plan.

### **3.2 Facilities, Procedures, Methods, or Equipment Not Yet Fully Operational (40 CFR 112.7)**

There are no facilities, procedures, methods, or equipment not yet fully operational.

### **3.3 Compliance with Applicable Requirements (40 CFR 112.7(a)(1))**

All elements of this Plan conform to the applicable requirements of this part.

### **3.4 Discussion of Allowed Deviations (40 CFR 112.7(a)(2))**

Deviations from certain requirements of 40 CFR 112.7 are allowed if equivalent environmental protection and an explanation of each variance from the requirements are provided.

40 CFR 112.7 (2) indicates deviations from the requirements of paragraph (g) (security), (h)(2) and (h)(3) (tank truck loading/unloading racks), (i) (field-constructed aboveground tanks), and subpart B (40 CFR 112.8) may be permissible, except deviations from paragraphs 112.8(c)(2) and 112.8(c)(11) are not permitted.

No deviations from the requirements exist at this Facility. This Plan complies with 112.7(g) [security] and there are no deviations from subpart B requirements in this Plan.

### **3.5 Facility Description (40 CFR 112.7(a)(3))**

This Spill Prevention, Control, and Countermeasure (SPCC) Plan has been prepared for the Facility located at 1165 Prairie Road in Rockton, Illinois.

This SPCC Plan addresses all operations at the entire Facility. These products are stored in aboveground storage tanks and drums. The quantity of petroleum products stored at this bulk plant Facility exceeds the regulatory threshold of 1,320 gallons. Therefore, the requirements of 40 CFR 112 are applicable to this Facility.

The Site Plan and Facility Diagrams included in Appendix A of this Plan show the location and layout of the Facility. They also show the location of oil containers, buildings, and critical spill control structures. As required under 40 CFR 112.7(a)(3), the Facility diagram(s) indicate the location and content of ASTs, and connecting piping.

#### 3.5.1 Type of Oil & Container Capacities (40 CFR 112.7(a)(3)(i))

Oil storage at the Facility consists of aboveground storage tanks and a varying stock of new and used oil drums and totes. The capacities of Oil Containers present at the site are listed in *Appendix K*. All containers with a capacity of 55 gallons, or more are included. Please see Appendix A for a site layout drawing of the tank locations. Representative Safety Data Sheets (SDS) for the products stored at this Facility are available on-site.

#### 3.5.2 Discharge Prevention Measures (40 CFR 112.7(a)(3)(ii))

The Facility uses written procedures for loading/unloading of petroleum products. See Appendix H for procedures. The operator must always remain within an arm's length of the shutoff valve and provide continuous supervision during all transfers. Fluid levels in the tanks which will receive the product are verified before connecting to the fill lines.

#### 3.5.3 Discharge Controls (40 CFR 112.7(a)(3)(iii))

Discharge controls are described in *Appendix K*.

#### 3.5.4 Discharge Discovery, Response and Cleanup (40 CFR 112.7(a)(3)(iv))

In the event of a spill, the employee discovering the spill must immediately contact the SPCC Coordinator or alternate by telephone or in-person. However, the employee discovering the spill must call for outside emergency assistance if the SPCC Coordinator is not available, and human health or the environment is threatened. Table 3-1 lists key personnel, including the SPCC Coordinator.

**Table 3-1: Facility Emergency Contacts**

Primary - Sean Stadler, Operations Manager, Chemtool  
(815) 389-0177 - Office

(b) (6)

Alternate - Josh Turnbull, Manufacturing Manager, Rockton  
(815) 389-0178 - Office

(b) (6)

The SPCC Coordinator, having the authority and training to mobilize the appropriate personnel and equipment to respond to the spill, shall:

1. Identify the character, source, quantity, extent, and degree of the spill.
2. Immediately initiate actions necessary to halt and contain the discharge (if, in the opinion of the SPCC Coordinator, these actions can be done safely). In general, the following steps are taken:
  - a. Eliminate potential spark sources;
  - b. Identify and shut down source of the discharge to stop the flow;
  - c. Contain the discharge with sorbents, berms, fences, trenches, sandbags, or other material;
  - d. Contact management; and,
  - e. Contact regulatory authorities and applicable response organizations identified in the Major Discharge instructions below (if necessary).
3. Remain in charge of all oil response activities until relieved by a more experienced (or higher ranking) incident commander, such as a Fire Chief.
4. If relieved, the Emergency Coordinator remains the Facility point of contact and remains responsible for the notification and recordkeeping responsibilities described elsewhere in this Plan.
5. Restore the environment to the extent practicable and minimize the harmful effects from any discharge to the air, lands, or waters of the state by collecting and disposing of recovered materials according to regulation and return the site to pre-spill conditions (see Part 3.5.4 and 3.5.5).

To further clarify appropriate response procedures, this Plan classifies Discharges as either “major” or “minor” depending on the volume and characteristics of the material released.

An Emergency Contact List is provided in Appendix F. The list is also posted at prominent locations throughout the Facility. A list of Discharge Response material kept at the Facility is included in Appendix I.

#### **Response to a Major Discharge**

A “major” discharge is defined as one that cannot be safely controlled or cleaned up by Facility personnel, such as when:

- The discharge is large enough to spread beyond the immediate discharge area;
- The discharged material enters the water;
- The discharge requires special equipment or training to clean up;
- The discharged material poses a hazard to human health or safety; or
- There is a danger of fire or explosion.

In the event of a major discharge, the following guidelines apply in addition to the generalized instructions above:

1. As necessary, the Emergency Coordinator must evacuate personnel, notify local authorities, advise if area control or evacuation of the surrounding community is recommended, activate emergency response personnel and equipment, and enlist outside emergency services. If the primary SPCC Coordinator and the alternate SPCC Coordinators are not present at the Facility, the senior on-site person has authority to initiate notification and response.
2. All workers must immediately evacuate the discharge site via the designated exits and move to the designated staging areas at a safe distance from the discharge.
3. Certain notifications are dependent on the circumstances and type of discharge. Specifically:
  - a. Report any spill that migrates off-site or poses a threat to human health or welfare to the local Police Department (911).
  - b. Report any spill that poses a fire or explosion hazard to the local Fire Department (911).
4. If workers are injured, the SPCC Coordinator or alternate must call for medical assistance.
5. The SPCC Coordinator or alternate must call the spill response and cleanup contractor listed in the Emergency Contacts List in Appendix F.
6. The SPCC Coordinator or alternate must immediately contact the Illinois Emergency Management Agency's 24-hour Hotline (800-782-7860) and the National Response Center (800-424-8802).
7. The SPCC Coordinator or alternate must record the call on the Discharge from Facility Notification Form in Appendix J and attach a copy to this SPCC Plan.
8. The SPCC Coordinator or alternate coordinates cleanup and obtains assistance from a cleanup contractor or other response organization as necessary.

If the SPCC Coordinator and alternate are not available at the time of the discharge, then the next highest person in seniority assumes responsibility for coordinating response activities.

### **Response to a Minor Discharge**

A "minor" discharge is defined as one that poses no significant harm (or threat) to human health and safety or to the environment. Minor discharges are generally those where:

- Provided the spill does not threaten to adversely impact human health or the environment, including situations that present a fire, explosion, or other safety hazards, the quantity of product discharged is small specifically when:
  - a) Gasoline and/or petroleum product spills are completely contained on an impervious surface (Does not qualify as a discharge—does not require reporting to outside agency)
  - b) Petroleum product spills are limited to quantities that are normally handled and are included in the company's hazard communication training (29 CFR 1910.1200)
  - c) Spills of substances with federal reportable quantities that are less than the reportable quantity
- Discharged material is easily stopped and controlled at the time of the discharge;
- Discharge is localized near the source; and
- Discharged material is not likely to reach water or a storm or sanitary drain.

Minor discharges can usually be cleaned up by Chemtool Inc. personnel. The following guidelines apply:

- Immediately notify the SPCC Coordinator or Alternate.
- Contain the discharge with Discharge Response materials and equipment.
- Place discharge debris in properly labeled waste containers.
- Complete the Discharge from Facility Notification Form (Appendix J).
- If the discharge involves more than 25 gallons onto a pervious surface or runs off an impervious surface, immediately call the Illinois EMA 24-hour Spill Reporting Hotline (1-800-782-6672). Discharges contained completely on an impervious surface do not need to be reported pursuant to the SPCC regulations.

The SPCC Coordinator is responsible for notifying outside emergency response organizations in the event their services are needed. Outside assistance may be requested for traffic control, community evacuation, fire, spill control, and cleanup, and medical emergencies. The SPCC Coordinator is also responsible for retaining cleanup subcontractors and procuring necessary materials and equipment.

#### 3.5.5 Disposal Methods (40 CFR 112.7(a)(3)(v))

The SPCC Coordinator must designate personnel and equipment and authorize assistance as needed. A local clean-up contractor may be used to handle clean-up and disposal activities at the Facility. Weirs, booms, and other barriers are used by the

contractor to collect the material for disposal. Appropriate absorbent materials are stored in the locations identified on Figure 2 in Appendix A.

Any wastes resulting from a minor Discharge Response will be containerized in impervious bags, drums, or buckets. The SPCC Coordinator will characterize the waste for proper disposal and ensure it is removed from the Facility by a licensed waste hauler. Wastes resulting from major Discharge Response will be removed and disposed of by a cleanup contractor.

If possible, reuse recovered materials either by returning to storage or by reclaiming. Spill residues and other contaminated materials must be characterized using SDS, analysis, or other available information, and disposed of in accordance with applicable regulations in a manner approved by the SPCC Coordinator. Any supplies or equipment depleted or destroyed, as a result of the spill or subsequent response activities, must be replaced as soon as possible. Restoration of the area affected by the spill must be completed as soon as practical.

#### 3.5.6 Emergency Contact List (40 CFR 112.7(a)(3)(vi))

The Emergency Contact List can be found in Appendix F.

### 3.6 Spill Reporting (40 CFR 112.7(a)(4))

Any size discharge (i.e., one that creates a sheen, emulsion, or sludge) that affects or threatens to affect navigable waters or adjoining shorelines must be reported immediately to the National Response Center (1-800-424-8802). The Center is staffed 24 hours a day.

A Discharge from Facility Notification Form is included in Appendix J to facilitate reporting. The person reporting the discharge must provide the following information:

- The name, address, and telephone number of the person reporting the discharge.
- The name, address, and telephone number of the discharger and any other responsible persons.
- Date, time, location, and duration of the discharge.
- Identity, physical state, and quantity of the material discharged.
- Physical, chemical, hazardous, and toxicological characteristics of the substance



- Cause of the discharge.
- Immediate actions being taken and the name of the contractor or other person performing the actions.
- Source, speed of movement, and destination of the material discharged.
- Actual or potential impact to human health or the environment, including actual or potential impacts to drinking water supplies.
- Weather conditions existing at the scene.
- Other agencies on the scene.

Contact information for reporting a Discharge to the appropriate authorities is listed in Appendix F, on the Discharge from Facility Notification Form in Appendix J and is also posted near Facility phone lines. The SPCC Coordinator must not postpone notification of appropriate agencies due to lack of complete information.

In addition to the above reporting, 40 CFR 112.4 requires under certain circumstances that information be submitted to the United States Environmental Protection Agency (EPA) Regional Administrator (see Section 2.4 of this Plan) and the appropriate state agency in charge of oil pollution control activities (see information in Appendix J for IEMA Spill Reporting Requirements).

### **3.7 Organize Plan for Ready Use in an Emergency (40 CFR 112.7(a)(5))**

Key portions of this Plan have been reproduced and placed in a quick reference section at the beginning of this Plan document. This will aid in quick retrieval of key information needed in the event of a release.

### **3.8 Potential Discharge Volumes and Direction of Flow (40 CFR 112.7(b))**

Appendix K presents expected volume, discharge rate, general direction of flow in the event of equipment failure and means of secondary containment for different parts of the Facility where oil is stored, used, or handled.

### **3.9 Containment and Diversionary Structures (40 CFR 112.7(c))**

The building itself and other containment structures act as secondary containment at this Facility to prevent oil from reaching navigable waters and adjoining shorelines. See **Appendix K** for a specific description of secondary containment at various locations at the Facility. The ASTs located in the railcar loading/unloading area are contained by the building and a grated

trench across the overhead doorways. The trench is connected to an automatic sump pump system that pumps any spilled material to the building interior. Additionally, Chemtool will provide and maintain in place, except when moving railcars, oil absorbent plugs in the railroad tracks to contain any spills within the building.

Shipments of drummed oils are removed from the transport vehicles in the loading dock area and placed in the product storage location. The oils are then transported to the various locations of the Facility as needed for operational usage. During all transportation procedures, drums within this Facility are transported via safe handling practices to prevent accidents and spills. Secondary containment is provided at all multiple drum locations within the Facility and storage areas.

If a leak or spill from any of the drums occurs due to overflow, rupture, or leakage, the secondary containment devices included as part of this Plan are capable of containing 100 percent by volume of the contents of the largest container within that containment. Containers located indoors with secondary containment are not provided with additional capacity to compensate for precipitation. Containers located outdoors with secondary containment are provided with sufficient capacity to compensate for precipitation.

Drum spills or failures that might occur during transportation will be cleaned up with sorbent materials and a wet vacuum. These materials will be placed into 55-gallon containers and labeled as to the contents. The Spill Prevention and Emergency Coordinator will determine the appropriate method to reuse or dispose of the spilled materials.

In the event of a parking lot or yard spill, appropriate response procedures utilizing the necessary spill equipment to contain the spill and prevent any discharge to storm or sanitary sewers will be employed. There are storm sewer inlets in the Facility yard or parking lot areas that discharge to the Rockton storm sewer system.

A complete description of the secondary containment devices used to prevent the discharge of oil from this Facility is included in this Section 112.7(c), while tank truck loading and unloading operations are detailed in Section 112.7(h).

Oil and/or coolant reservoirs on process machinery within the building envelope are not required to have discrete secondary containment. Spill control equipment is available to respond to releases from this equipment.

There are no drains constructed within any containment areas. Any oil that may leak into a secondary containment area will be removed using a drying agent, submersible type pump, or vacuum-equipped device. Any product oils recovered will be placed into properly labeled 55-gallon drums, or into bulk tanks of like products, and used within normal business operations. Any used oils recovered will be placed into properly labeled containers or an acceptable transfer vehicle prior to being transported to an appropriate Facility.

In addition to the secondary containment devices, inspections, and clean-up procedures outlined above, the Facility employs reduction measures related to the amount of oil stored on-site. These measures are periodically reviewed and modified to ensure that materials in excess of those required for reasonable business operations are not being stored at the Facility.

For oils in bulk storage tank loading areas or those transported by forklift, the spill control equipment (included in the Appendix section of this Plan) will be used to respond to spills. The spill control and response equipment is located at strategic locations determined by the Spill Prevention and Emergency Coordinator and readily accessible by spill response personnel. Materials that may not be absorbed or contained with the use of these materials, due to response time or larger spills, will be subject to additional effective containment measures. A notice which is communicated to vendors who load or unload oil is included as an Appendix to this Plan.

Section 1.0 of this Plan identifies Facility personnel trained in response and reporting procedures to be notified in the event of a release outside of the Facility's secondary containment structures. Also included in Section 1.0 are phone numbers for clean-up contractors and release reporting if necessary. Information required to be reported is identified in Section 3.4 of this Plan and included in the Appendix section of this Plan. Reporting applicability will be determined by the Primary Spill Prevention and Emergency Coordinator.

### **3.10 Practicability of Secondary Containment (40 CFR 112.7(d))**

Facility management have determined the use of containment and diversionary structures and/or readily available equipment at this Facility is practical and effective to prevent any discharged oil (non-hazardous liquid waste) from reaching navigable waters.

### **3.11 Inspections, Tests, and Records (40 CFR 112.7(e))**

As required by the SPCC rule, Chemtool Inc. will perform inspections, tests, and evaluations as outlined below. The inspections and tests are described later in this section, and in the respective sections that describe different parts of the Facility (e.g., Part 4.3 for Bulk Storage Containers).

#### **3.11.1 Informal Observations**

Chemtool Inc. employees perform informal observations of storage tanks during loading/unloading activities. These observations involve looking for tank/piping damage or leakage, stained or discolored soils, or excessive accumulation of water in diked areas.

#### **3.11.2 Monthly Inspection**

Documented inspections will be conducted monthly to examine the exterior of the tanks and the containment areas. Chemtool Inc. personnel use the Checklist provided in Appendix C for monthly inspections. The monthly inspections include, but are not limited to, the following key elements:

- Observing the exterior of aboveground storage tanks, pipes, and other equipment for signs of deterioration, leaks, corrosion, and thinning.
- Observing tank foundations and supports for signs of instability or excessive settlement.
- Observing the tank fill and discharge pipes for signs of poor connection that could cause a discharge, and tank vent for obstructions and proper operation.
- Verifying the proper functioning of the overfill prevention systems.
- Checking the inventory of Discharge Response Equipment and restocking as needed.
- Observing the loading/unloading area(s), secondary containment, and lighting.

Problems regarding tanks, piping, containment, or response equipment will be immediately reported to management. Visible oil leaks from tank walls, piping, or other components are repaired as soon as possible to prevent a larger spill or a

discharge to navigable waters or adjoining shorelines. Pooled oil is removed immediately upon discovery.

Written monthly inspection records will be signed by the inspector and maintained with this SPCC Plan for a period of three (3) years.

#### 3.11.3 Annual Inspection

Facility personnel will perform a more thorough inspection of Facility equipment on an annual basis. This annual inspection will be performed using the Checklist provided in Appendix C of this Plan. Written annual inspection records will be signed by the inspector and maintained for a period of three (3) years.

#### 3.11.4 Integrity Testing

The scope and schedule of inspections to be performed on the Facility's ASTs are specified in STI Standard SP-001 and API 653. **Appendix L** summarizes inspections to be performed on Bulk Storage Containers.

##### 3.11.4.1 Required Integrity Testing Schedule-Category 1 Shop-Fabricated ASTs

Initial standardized integrity testing is required for each Category 1 aboveground bulk storage container greater than 5,000 gallons. The visual inspection frequency listed above will be combined with non-destructive testing per the appropriate industrial standards. The frequency of inspection intervals and the nature of the testing must take into account many factors. These factors include, but are not limited to:

- The nature of the product stored within.
- The results of visual maintenance checks.
- Corrosion allowances and corrosion rates.
- Corrosion prevention systems and leak detection systems.
- The results of previous inspections.
- The methods and materials of construction and repair.
- Tank location, such as those in isolated or high-risk areas.
- Changes in operating mode or service (example: change in frequency of fill cycling).
- Regulatory or jurisdictional requirements.

Based on best engineering practices and the bulk tanks location, composition, and products stored; the Steel Tank Institute's (STI) SP001 standard, 5th Edition has been selected to determine tank integrity and testing frequency for shop-fabricated steel aboveground storage tanks, welded or riveted, and operating at atmospheric pressure. The standard focuses on the structural integrity of roof, thickness of tank walls and bottom, and integrity of tank foundation and anchor bolts. In addition, the STI standard requires that a formal external inspection of all tanks greater than 5,000 gallons be completed. A formal external inspection schedule of each applicable tank is included in Appendix L. Additional formal external inspections of the ASTs will be completed at least every 20 years as required by the standard.

### **3.12 Personnel, Training, and Discharge Prevention Procedures (40 CFR 112.7(f))**

#### **3.12.1 Training Oil-Handling Personnel (40 CFR 112.7(f)(1))**

Chemtool Inc. management will instruct oil-handling Facility personnel in operation and maintenance of oil pollution prevention equipment, discharge procedure protocols, applicable pollution control laws, rules and regulations, general facility operations, and the content of this SPCC Plan. All oil handling employees are required to have spill prevention training, which includes a complete review of Chemtool Inc. SPCC Plan. Training is also provided when changes are made to the existing Plan or new procedures are incorporated into the Plan.

#### **3.12.2 Designated Person (40 CFR 112.7(f)(2))**

The SPCC Coordinator is the designated person accountable for oil spill prevention at the Facility and has the authority to commit the necessary resources to implement this Plan. An alternate is listed in Table 3-1.

#### **3.12.3 Annual Discharge Prevention Meetings (40 CFR 112.7(f)(3))**

Annual safety briefings will be held for Facility personnel involved in fuel or oil operations. These briefings are aimed at ensuring continued understanding and adherence to the discharge prevention procedures presented in the SPCC Plan. The briefings also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Facility operators and other personnel have the opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during Facility operations. Any near misses or incidents are discussed immediately to prevent them from recurring. Records of the briefings and discharge prevention training will be kept on the form shown in Appendix D and maintained for a period of three (3) years.

### **3.13 Security (40 CFR 112.7(g))**

All ingress and egress in or from the Facility is monitored. In addition, any areas within the Facility that store oils are locked at all times when authorized personnel are not present. Master flow and drain valves are locked, starters on oil pumps are locked in the off position, and oil pipelines are capped. Lighting is provided throughout the Facility yard during

darkness and is adequate for spill detection by Facility personnel, non-personnel, and patrolmen during non-operating hours. The Facility lighting also acts as a deterrent against acts of vandalism.

#### **3.14 Tank Truck Loading/Unloading Rack (40 CFR 112.7(h))**

The Facility does not have a loading/unloading rack as defined in 40 CFR 112. Flexible hoses are used to unload railcars and truck deliveries of oil.

Prior to filling and departure of any tank car or tank truck, Facility will closely inspect for discharges to the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.

A notice which is communicated to vendors who provide bulk tank truck loading or unloading services is included as an Appendix to this Plan.

#### **3.15 Brittle Fracture Evaluation (40 CFR 112.7(i))**

Not Applicable. The Facility does not have field-constructed aboveground containers.

#### **3.16 Conformance with State and Local Applicable Requirements (40 CFR 112.7(j))**

This document contains a discussion of conformance with applicable requirements and effective discharge prevention, and containment procedures as listed in this Part and any applicable more stringent State rules, regulations, and guidelines.

#### **3.17 Qualified Oil-filled Operational Equipment (40 CFR 112.7(k))**

Not Applicable. This Facility has no oil-filled operational equipment as defined in 40 CFR 112.2.



## **Part 4: SPCC Provisions for Onshore Facilities**

### **(Excluding Production Facilities)**

#### **4.1 General Requirements (40 CFR 112.8 (a))**

Chemtool Inc. meets the general requirements for the Plan listed under 112.7 and the specific discharge prevention and containment procedures listed in this section.

#### **4.2 Facility Drainage (40 CFR 112.8(b) (1-5))**

Drainage from containment areas (including those containment areas created by covering a storm or floor drain during a spill event) is typically positive in that no escape routes exist without sump pumps, ejectors, or wet vacuum actuation. All sump pumps, ejectors, or wet vacuums will be operated manually, and any accumulation will be examined prior to being discharged to assure that a harmful quantity of oil is not discharged. In the situation where a tank is drained to surface water, the valves and drainage system will be designed in accordance with the regulations and drainage will be executed per 112.8(c)(3).

Facility drainage will not be necessary as the secondary containment systems are primarily inside the Facility. Housekeeping is performed by mopping the floor.

The exception to the secondary containment located inside the building is for the trench drain located at the truck unloading dock on the south side of the building. That area is restrained from discharge into any adjacent watercourse through manually operated open-and-close design valve in that discharge piping. That valve is located near the fence line at the southwest corner of the building near the rail unloading area. The Facility shall inspect the retained storm water and then open the valve only after it has been determined that only clean storm water will be released.

Drainage waters are not treated at this Facility.

#### 4.3 Bulk Storage Containers (40 CFR 112.8(c))

##### 4.3.1 Construction (40 CFR 112.8(c)(1))

All Bulk Storage Containers are constructed in accordance with either API or STI industry specifications. The design and construction of all Bulk Storage Containers are compatible with the characteristics of the oil product they contain and with temperature and pressure conditions.

##### 4.3.2 Secondary Containment (40 CFR 112.8(c)(2))

Sufficient containment for bulk storage tanks is such that it would hold the entire contents of the single largest container. Containers located indoors with secondary containment are not provided with additional capacity to compensate for precipitation. Containers located outdoors with secondary containment are provided with sufficient capacity to compensate for precipitation. See Appendix K for a description of secondary containment structures.

##### 4.3.3 Drainage of Diked Areas (40 CFR 112.8(c)(3))

Rainwater will not come in contact with diked areas located inside a building. If the Facility has rainwater from a diked area to discharge to a storm drain or other surface water; it must keep the bypass valve closed, inspect the retained rainwater to ensure that a harmful quantity of oil is not discharged, operate the bypass valve under responsible supervision, and keep records of such drainage of retained material.

##### 4.3.4 Corrosion Protection (40 CFR 112.8(c)(4))

This section is not applicable since there are no buried tanks on-site.

##### 4.3.5 Partially Buried and Bunkered Tanks (40 CFR 112.8(c)(5))

Not applicable because there are no partially buried tanks at this Facility.

##### 4.3.6 Inspection and Tests (40 CFR 112.8(c)(6))

Monthly inspections of all aboveground tanks are completed to verify tank integrity, and the company maintains records of these inspections.

All ASTs (including totes and drums) containing oil or oily materials will be examined visually by appropriate personnel for condition and the need for maintenance on a monthly basis. Such an examination will include aboveground foundation and tank structural supports. The outside of the tanks will be observed for signs of deterioration; leaks from seams, rivets, bolts, and gaskets; and accumulation of oil or oily materials inside containment structures. All aboveground valves and piping will be examined on a monthly basis for the general condition of items such as supports, flange joints, expansion joints, valve glands and bodies, and drip pans.

Containment structures and devices will also be inspected monthly for accumulation of oil or oily materials and to ensure the integrity of containment structures and devices. These inspections will be documented, signed by the inspector, and kept for a period of not less than three (3) years.

Facility will ensure the qualifications for the personnel performing and the frequency and type of tests and inspections will be in accordance with industry standards such as the American Petroleum Institute or the Steel Tank Institute. Such determination will take into account the container size, configuration, and design.

#### Required Inspection Schedule

##### 1. Aboveground Tanks

Visual Inspection of System Integrity - monthly/annually

Visual Exterior Inspection - monthly/annually

Visual Inspection of Structural Supports - monthly/annually

Visual Inspection of Secondary Containment Structures - monthly/annually

##### 2. Liquid-Level Indicators

Visually Inspect - monthly

##### 3. Aboveground Piping

Visual Exterior Inspection - monthly/annually

#### 4.3.7 Heating Coils (40 CFR 112.8(c)(7))

Not applicable because there are no heating coils at this Facility.

#### 4.3.8 Overfill Prevention Systems (40 CFR 112.8(c)(8))

The Facility will install and/or utilize one of the following engineering practices or devices to prevent overfilling of containers:

- High liquid level alarm with an audible or visible signal. Signal will be constantly attended when the tank is being filled.
- High liquid level pump cutoff device.
- Direct audible or code signal communication between container gauges and pumping station.
- Fast response system for determining the liquid level of each bulk storage container. Includes, but not limited to, digital computers, telepulse, or direct vision gauges. With this alternative, a person will be present to monitor gauges when the tank is being filled.

The above liquid level sensing devices will be tested regularly to ensure proper operation.

#### 4.3.9 Effluent Treatment Facilities (40 CFR 112.8(c)(9))

Not applicable because there is no effluent treatment done at this Facility.

#### 4.3.10 Visible Discharges (40 CFR 112.8(c)(10))

Visible oil leaks will be promptly corrected. Accumulations of oils in diked areas or secondary containment will be promptly removed.

#### 4.3.11 Mobile and Portable Containers (40 CFR 112.8(c)(11))

Mobile or portable oil storage containers will be positioned or located to prevent spilled oil from reaching navigable waters. Any discharged material is quickly contained and cleaned up using sorbent pads or appropriate cleaning products.

### 4.4 Transfer Operations, Pumping, and In-Plant Processes (40 CFR 112.8(d))

#### 4.4.1 Buried Piping Corrosion Protection (40 CFR 112.8(d)(1))

Not Applicable. The Facility does not have any buried oil piping.

#### 4.4.2 Transfer Point Terminal Connections (40 CFR 112.8(d)(2))

The Facility will cap or blank the terminal connection at the transfer point and mark it as to origin when the piping is not in service or is in stand-by service for an extended time.

#### 4.4.3 Pipe Support Design (40 CFR 112.8(d)(3))

All pipe supports are designed to minimize abrasion and corrosion and to allow for expansion and contraction.

#### 4.4.4 Aboveground Valve and Piping Inspections (40 CFR 112.8(d)(4))

Aboveground piping and valves are also examined during the monthly inspection discussed in Parts 3.11.2 and 4.3.6. These inspections are documented (see Appendix C).

#### 4.4.5 Aboveground Piping Protection from Vehicles (40 CFR 112.8(d)(5))

If aboveground piping is near normal vehicular traffic patterns, vehicles entering the Facility will be warned to exercise caution to avoid endangering aboveground piping.

#### 4.5 Spill Prevention, Control, and Countermeasure Plan Requirements for Onshore Oil Production Facilities (40 CFR 112.9)

Not Applicable. This Facility is not an oil production Facility.

#### 4.6 Spill Prevention, Control, and Countermeasure Plan Requirements for Onshore Oil Drilling and Workover Facilities (40 CFR 112.10)

Not Applicable. This Facility is not an oil drilling or workover Facility.

#### 4.7 Spill Prevention, Control, and Countermeasure Plan Requirements for Offshore Oil Drilling, Production, or Workover Facilities (40 CFR 112.11)

Not Applicable. This Facility is not an oil drilling, production, or workover Facility.

#### 4.8 Subpart C - Requirements for Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils; and for Vegetable Oils, including Oils from Seeds, Nuts, Fruits, and Kernels (40 CFR 112.12)

Not Applicable. This Facility does not use animal, fish, or vegetable oils.

#### **4.9 Substantial Harm Determination (40 CFR 112.20(a-i))**

Chemtool Inc. management has determined this Facility does not pose a risk of substantial harm under 40 CFR part 112, as recorded in the "Substantial Harm Certification" included in Appendix B of this Plan.

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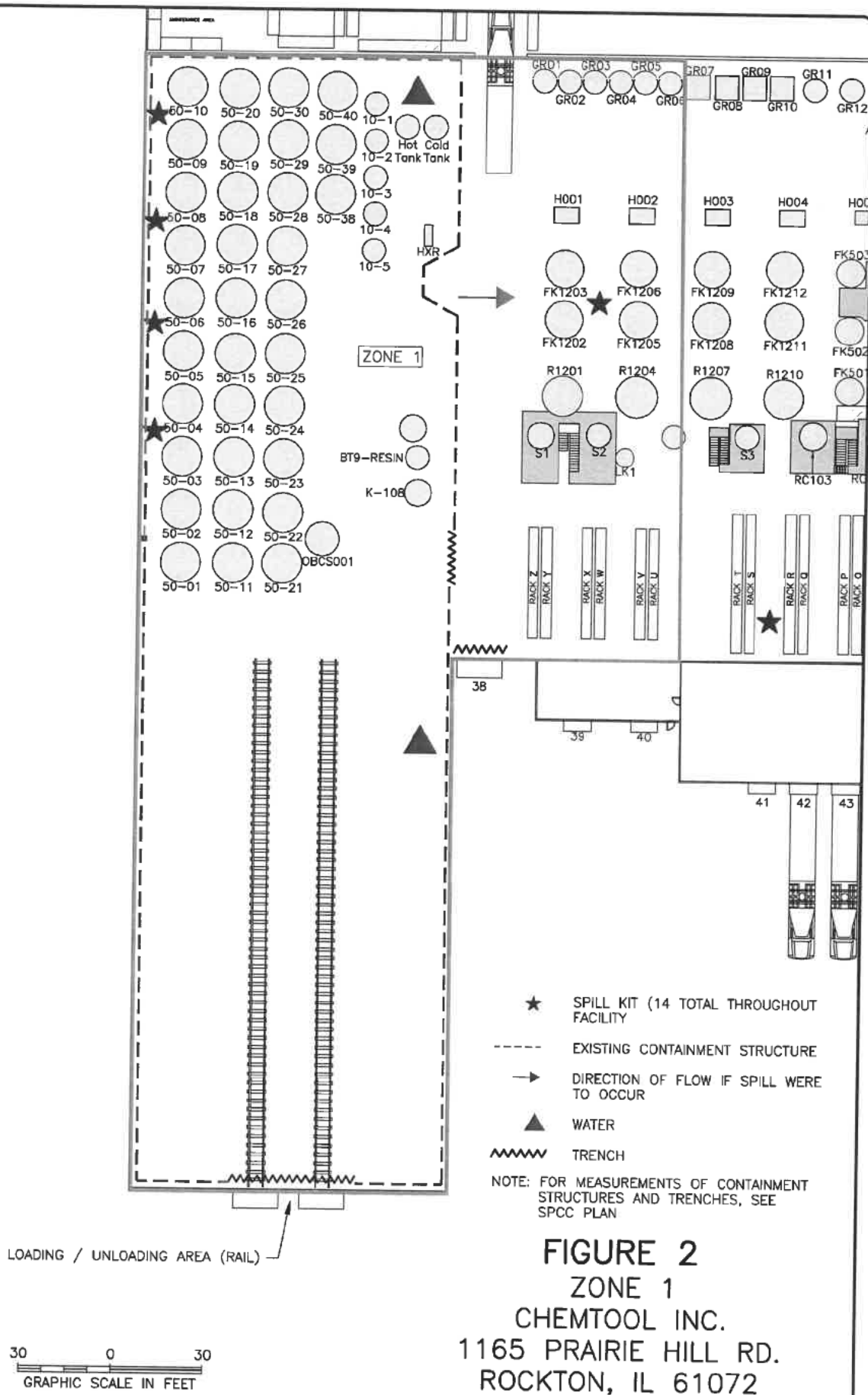
## Appendices

## **Appendix A**

### **Site Plan and Facility Diagrams**







09/10/19

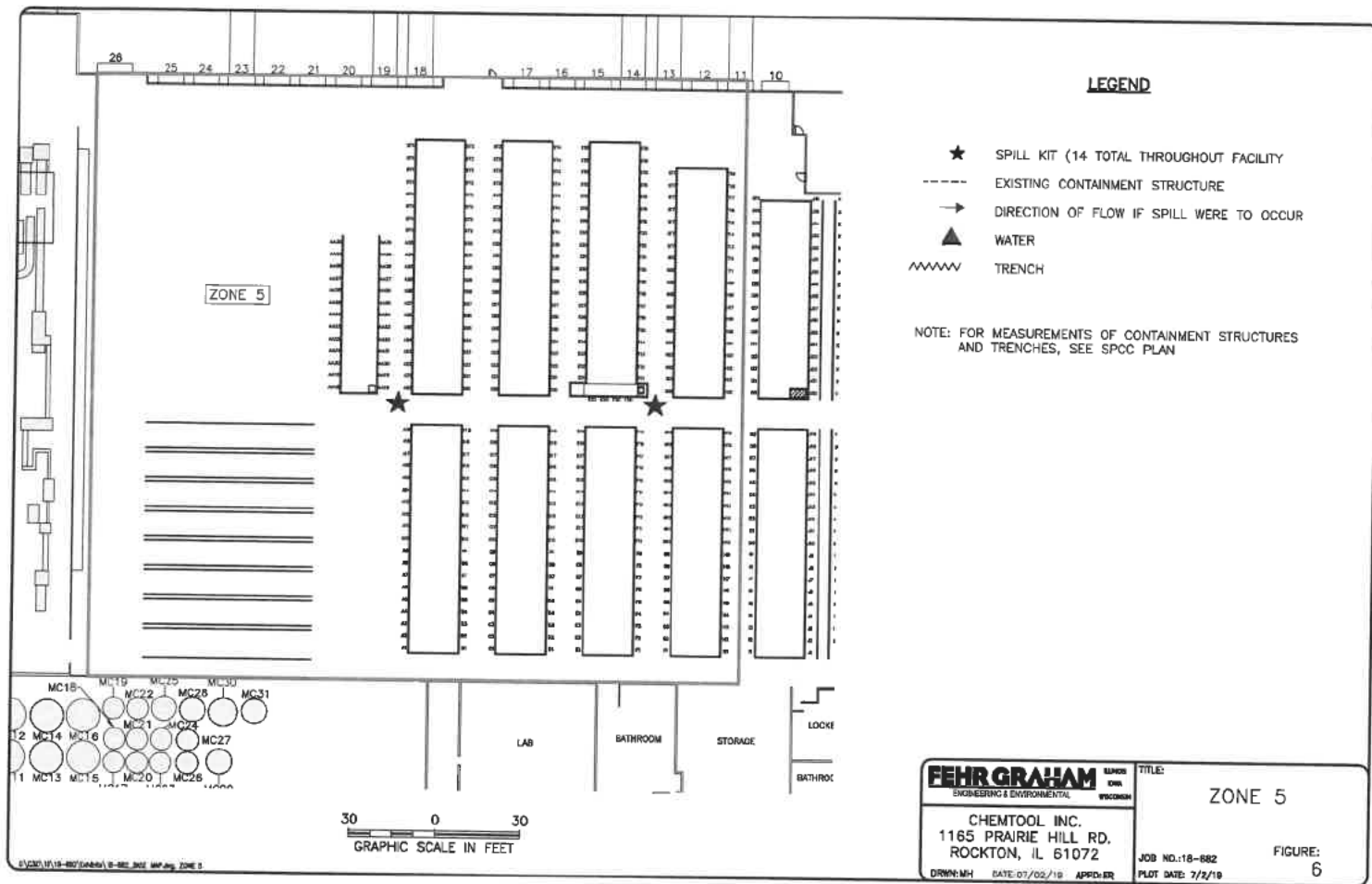
**FEHR GRAHAM**  
ENGINEERING & ENVIRONMENTAL

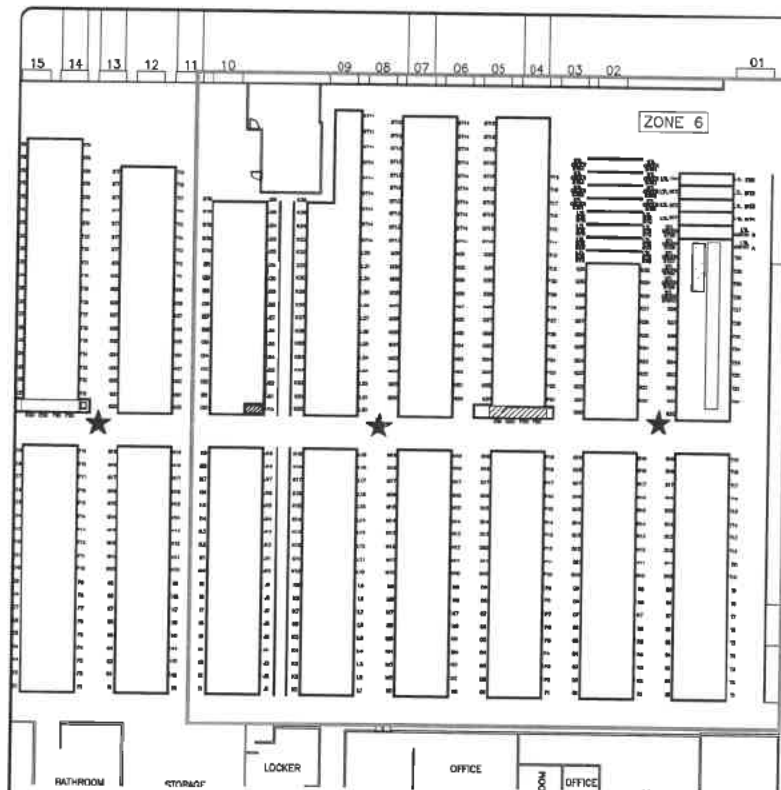
ILLINOIS  
IOWA  
WISCONSIN











# LEGEND

- ★ SPILL KIT (14 TOTAL THROUGHOUT FACILITY)
- EXISTING CONTAINMENT STRUCTURE
- DIRECTION OF FLOW IF SPILL WERE TO OCCUR
- ▲ WATER
- ~~~~~ TRENCH

NOTE: FOR MEASUREMENTS OF CONTAINMENT STRUCTURES AND TRENCHES, SEE SPCC PLAN

30 0 30  
GRAPHIC SCALE IN FEET

**FEHR GRAHAM**  
ENGINEERING & ENVIRONMENTAL  
CHERNTOL INC.  
1165 PRAIRIE HILL RD.  
ROCKTON, IL 61072  
DRAWN: UH DATE: 07/02/19 APP'D: ER

TITLE: ZONE 6

JOB NO.: 18-882  
PLOT DATE: 7/2/19

FIGURE: 7

© 2019 FEHR GRAHAM

## **Appendix B**

### **Substantial Harm Certification**



## Certification of Substantial Harm Determination Form

Facility Name: Chemtool Inc.

Facility Address: 1165 Prairie Hill Road, Rockton, Illinois, 61072

1. Does the Facility have a maximum aboveground oil storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfers of oil to or from vessels? Yes \_\_\_\_\_ No X
2. Does the Facility have a maximum aboveground storage capacity greater than or equal to one million (1,000,000) gallons and is the Facility without secondary containment for each aboveground storage area sufficiently large to contain the capacity of the largest aboveground storage tank within the storage area? Yes \_\_\_\_\_ No X
3. Does the Facility have a maximum aboveground storage capacity greater than or equal to one million (1,000,000) gallons and is the Facility located at a distance (as calculated using the appropriate formula in Attachment C-III<sup>1</sup> or an alternate formula<sup>2</sup> considered acceptable by the RA) such that a discharge from the Facility could cause injury to an environmentally sensitive area as defined in Appendix D<sup>1</sup>? Yes X No \_\_\_\_\_
4. Does the Facility have a maximum aboveground storage capacity greater than or equal to one million (1,000,000) gallons and is the Facility located at a distance (as calculated using the appropriate formula in Attachment C-III<sup>1</sup> or an alternative formula<sup>2</sup> considered acceptable by the RA) such that a discharge from the Facility would shut down a public drinking water intake? Yes \_\_\_\_\_ No X
5. Does the Facility have a maximum aboveground storage capacity greater than or equal to one million (1,000,000) gallons and within the past 5 years, has the Facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons? Yes \_\_\_\_\_ No X

### Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature \_\_\_\_\_

Date: \_\_\_\_\_

Name: \_\_\_\_\_

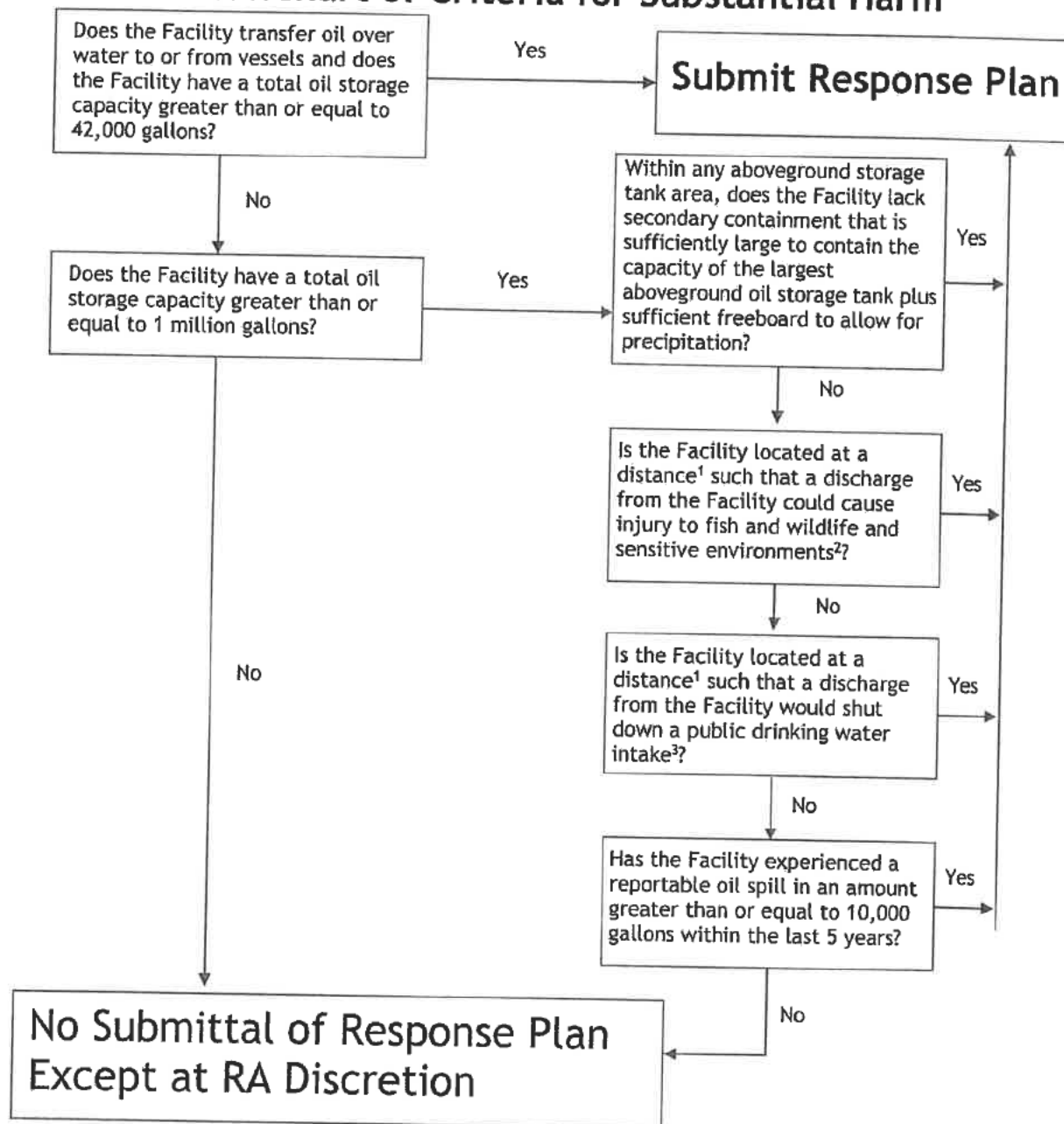
(Printed) Sean Stadler

Title: Operations Manager

<sup>1</sup> 40 CFR 112 Appendix C - Attachment C-III, Appendix D, proposed 58 FR 8853, 58 FR 8858, February 17, 1993.

<sup>2</sup> If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to this form.

## Flowchart of Criteria for Substantial Harm



1 Calculated using the appropriate formula in Attachment C-III on this appendix or a comparable formula.

2 For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidelines for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environment" (59 FR 14713, March 29, 1994) and the applicable Area Contingency Plan

3 Public drinking water, intakes are analogous to public water systems as described at 40 CFR 143.2(c).

**Appendix C**  
**Facility Checklists / Forms**

## STI SP001 AST Record

Form completed by (Name) \_\_\_\_\_

(Title) \_\_\_\_\_

Date \_\_\_\_\_

OWNER INFORMATION	FACILITY INFORMATION	INSTALLER INFORMATION
Name	Name	Name
Number and Street	Number and Street	Number and Street
City, State, Zip Code	City, State, Zip Code	City, State, Zip Code
	Regulatory facility ID number (if applicable)	

OWNER'S TANK ID	OTHER ID	INITIAL SERVICE DATE
Manufacturer: _____	Contents: _____	Construction Date: _____
Dimensions: _____	Capacity: _____	Last Repair/Reconstruction Date: _____
Design: <input type="checkbox"/> UL _____ <input type="checkbox"/> Horizontal	<input type="checkbox"/> SWRI _____ <input type="checkbox"/> Vertical	<input type="checkbox"/> API _____ <input type="checkbox"/> Rectangular
Construction: <input type="checkbox"/> Bare Steel <input type="checkbox"/> Coated Steel <input type="checkbox"/> Double-Bottom	<input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date Installed: _____ <input type="checkbox"/> Concrete encased steel <input type="checkbox"/> Stainless steel <input type="checkbox"/> Other _____ <input type="checkbox"/> Double-Wall <input type="checkbox"/> Lined inside; Date lining installed: _____	
Spill control: <input type="checkbox"/> Earthen Dike <input type="checkbox"/> Steel Dike <input type="checkbox"/> Concrete <input type="checkbox"/> None <input type="checkbox"/> Other _____	CRDM: <input type="checkbox"/> yes <input type="checkbox"/> no If yes, type: <input type="checkbox"/> Release Prevention Barrier <input type="checkbox"/> Elevated tank <input type="checkbox"/> Double bottom tank <input type="checkbox"/> Double wall tank <input type="checkbox"/> CE-AST <input type="checkbox"/> other _____	
Tank elevated on supports <input type="checkbox"/> yes <input type="checkbox"/> no Support material: <input type="checkbox"/> steel <input type="checkbox"/> concrete <input type="checkbox"/> other _____		
Release Prevention Barrier: <input type="checkbox"/> yes <input type="checkbox"/> no If yes, Date Installed: _____ If yes, Type: <input type="checkbox"/> concrete <input type="checkbox"/> synthetic liner <input type="checkbox"/> clay liner <input type="checkbox"/> steel <input type="checkbox"/> other _____	AST Category: <input type="checkbox"/> Category 1 <input type="checkbox"/> Category 2 <input type="checkbox"/> Category 3	

OWNER'S TANK ID		OTHER ID		INITIAL SERVICE DATE	
Manufacturer:		Contents:		Construction Date:	
Dimensions:		Capacity:		Last Repair/Reconstruction Date:	
Design: <input type="checkbox"/> UL _____		<input type="checkbox"/> SwRI _____		Last Change of Product Date:	
<input type="checkbox"/> Horizontal		<input type="checkbox"/> Vertical		<input type="checkbox"/> API _____ <input type="checkbox"/> Other _____ <input type="checkbox"/> Unknown	
<input type="checkbox"/> Rectangular					
Construction: <input type="checkbox"/> Bare Steel		<input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date Installed: _____			
<input type="checkbox"/> Coated Steel		<input type="checkbox"/> Concrete encased steel <input type="checkbox"/> Stainless steel <input type="checkbox"/> Other _____			
<input type="checkbox"/> Double-Bottom		<input type="checkbox"/> Double-Wall <input type="checkbox"/> Lined inside; Date lining installed: _____			
Spill control: <input type="checkbox"/> Earthen Dike <input type="checkbox"/> Steel Dike <input type="checkbox"/> Concrete		CRDM: <input type="checkbox"/> yes <input type="checkbox"/> no			
<input type="checkbox"/> None <input type="checkbox"/> Other _____		If yes, type: <input type="checkbox"/> Release Prevention Barrier <input type="checkbox"/> Elevated tank <input type="checkbox"/> Double bottom tank			
Tank elevated on supports <input type="checkbox"/> yes <input type="checkbox"/> no		<input type="checkbox"/> Double wall tank <input type="checkbox"/> CE-AST <input type="checkbox"/> other _____			
Support material: <input type="checkbox"/> steel <input type="checkbox"/> concrete <input type="checkbox"/> other _____		AST Category: <input type="checkbox"/> Category 1 <input type="checkbox"/> Category 2 <input type="checkbox"/> Category 3			
Release Prevention Barrier: <input type="checkbox"/> yes <input type="checkbox"/> no If yes, Date Installed: _____					
If yes, Type: <input type="checkbox"/> concrete <input type="checkbox"/> synthetic liner <input type="checkbox"/> clay liner <input type="checkbox"/> steel <input type="checkbox"/> other _____					

OWNER'S TANK ID		OTHER ID		INITIAL SERVICE DATE	
Manufacturer:		Contents:		Construction Date:	
Dimensions:		Capacity:		Last Repair/Reconstruction Date:	
Design: <input type="checkbox"/> UL _____		<input type="checkbox"/> SwRI _____		Last Change of Product Date:	
<input type="checkbox"/> Horizontal		<input type="checkbox"/> Vertical		<input type="checkbox"/> API _____ <input type="checkbox"/> Other _____ <input type="checkbox"/> Unknown	
<input type="checkbox"/> Rectangular					
Construction: <input type="checkbox"/> Bare Steel		<input type="checkbox"/> Cathodically Protected (Check one: A. <input type="checkbox"/> Galvanic or B. <input type="checkbox"/> Impressed Current) Date Installed: _____			
<input type="checkbox"/> Coated Steel		<input type="checkbox"/> Concrete encased steel <input type="checkbox"/> Stainless steel <input type="checkbox"/> Other _____			
<input type="checkbox"/> Double-Bottom		<input type="checkbox"/> Double-Wall <input type="checkbox"/> Lined inside; Date lining installed: _____			
Spill control: <input type="checkbox"/> Earthen Dike <input type="checkbox"/> Steel Dike <input type="checkbox"/> Concrete		CRDM: <input type="checkbox"/> yes <input type="checkbox"/> no			
<input type="checkbox"/> None <input type="checkbox"/> Other _____		If yes, type: <input type="checkbox"/> Release Prevention Barrier <input type="checkbox"/> Elevated tank <input type="checkbox"/> Double bottom tank			
Tank elevated on supports <input type="checkbox"/> yes <input type="checkbox"/> no		<input type="checkbox"/> Double wall tank <input type="checkbox"/> CE-AST <input type="checkbox"/> other _____			
Support material: <input type="checkbox"/> steel <input type="checkbox"/> concrete <input type="checkbox"/> other _____		AST Category: <input type="checkbox"/> Category 1 <input type="checkbox"/> Category 2 <input type="checkbox"/> Category 3			
Release Prevention Barrier: <input type="checkbox"/> yes <input type="checkbox"/> no If yes, Date Installed: _____					
If yes, Type: <input type="checkbox"/> concrete <input type="checkbox"/> synthetic liner <input type="checkbox"/> clay liner <input type="checkbox"/> steel <input type="checkbox"/> other _____					

## STI SP001 Monthly Inspection Checklist

### General Inspection Information:

Inspection Date: _____	Prior Inspection Date: _____	Retain until date: _____
Inspector Name (print): _____	Title: _____	
Inspector's Signature _____		
Tank(s) Inspected ID _____		
Regulatory facility name and ID number (if applicable) _____		

### Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable). Inspections of multiple tanks may be captured on one form as long as the tanks are substantially the same.
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Upon discovery of water in the primary tank, secondary containment area, interstice, or spill container, remove promptly or take other corrective action. Inspect the liquid for regulated products or other contaminants and dispose of properly.
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- After severe weather (snow, ice, windstorms) or maintenance (such as coating) that could affect the operation of critical components (normal and emergency vents, valves), an inspection of these components is required as soon as the equipment is safely accessible after the event.

ITEM		STATUS	COMMENTS / DATE CORRECTED
<b>Tank and Piping</b>			
1	Is tank exterior (roof, shell, heads, bottom, connections, fittings, valves, etc.) free of visible leaks? <i>Note: If "No", identify tank and describe leak and actions taken.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Is the tank liquid level gauge legible and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
3	Is the area around the tank (concrete surfaces, ground, containment, etc.) free of visible signs of leakage?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

4	Is the primary tank free of water or has another preventative measure been taken? NOTE: Refer to paragraphs 6.10 and 6.11 of the standard for alternatives for Category 1 tanks. N/A is only appropriate for these alternatives.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
5	For double-wall or double bottom tanks or CE-ASTs, is interstitial monitoring equipment (where applicable) in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
6	For double-wall tanks or double bottom tanks or CE-ASTs, is interstice free of liquid? Remove the liquid if it is found. If tank product is found, investigate possible leak.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Equipment on tank</b>			
7	If overfill equipment has a "test" button, does it activate the audible horn or light to confirm operation? If battery operated, replace battery if needed.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
8	Is overfill prevention equipment in good working condition? If it is equipped with a mechanical test mechanism, actuate the mechanism to confirm operation.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
9	Is the spill container (spill bucket) empty, free of visible leaks and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
10	Are piping connections to the tank (valves, fittings, pumps, etc.) free of visible leaks? Note: If "No", identify location and describe leak.	<input type="checkbox"/> Yes <input type="checkbox"/> No	
11	Do the ladders/platforms/walkways appear to be secure with no sign of severe corrosion or damage?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Containment (Diking/Impounding)</b>			
12	Is the containment free of excess liquid, debris, cracks, corrosion, erosion, fire hazards and other integrity issues?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
13	Are dike drain valves closed and in good working condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
14	Are containment egress pathways clear and any gates/doors operable?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Concrete Exterior AST (CE-AST)</b>			
15	Inspect all sides for cracks in concrete. Are there any cracks in the concrete exterior larger than 1/16"?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
16	Inspect concrete exterior body of the tank for cleanliness, need of coating, or rusting where applicable. Tank exterior in acceptable condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
17	Visual inspect all tank top openings including nipples, manways, tank top overfill containers, and leak detection tubes. Is the sealant between all tank top openings and concrete intact and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Other Conditions</b>			
18	Is the system free of any other conditions that need to be addressed for continued safe operation?	<input type="checkbox"/> Yes <input type="checkbox"/> No	

Additional Comments:

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## STI SP001 Annual Inspection Checklist

### General Inspection Information:

Inspection Date: _____	Prior Inspection Date: _____	Retain until date: _____
Inspector Name (print): _____	Title: _____	
Inspector's Signature: _____		
Tank(s) Inspected ID: _____		
Regulatory facility name and ID number (if applicable): _____		

### Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- For equipment not included in this Standard, follow the manufacturer recommended inspection/testing schedules and procedures.
- The periodic AST Inspection is intended for monitoring the external AST condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector per paragraph 4.1.2 of the standard.
- Remove promptly standing water or liquid discovered in the primary tank, secondary containment area, interstice, or spill container. Before discharge to the environment, inspect the liquid for regulated products or other contaminants and disposed of it properly.
- In order to comply with EPA SPCC (Spill Prevention, Control and Countermeasure) rules, a facility should regularly test liquid level sensing devices to ensure proper operation (40 CFR 112.8(c)(8)(v)).
- Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a Certified Inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.
- Complete this checklist on an annual basis, supplemental to the owner monthly-performed inspection checklists.
- **Note:** If a change has occurred to the tank system or containment that may affect the SPCC plan, the condition should be evaluated against the current plan requirement by a Professional Engineer knowledgeable in SPCC development and implementation.

ITEM		STATUS	COMMENTS / DATE CORRECTED
<b>Tank Foundation/Supports</b>			
1	Free of tank settlement or foundation washout?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
2	Concrete pad or ring wall free of cracking and spalling?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

3	Tank supports in satisfactory condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
4	Is water able to drain away from tank if tank is resting on a foundation or on the ground?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
5	Is the grounding strap between the tank and foundation/supports in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Tank Shell, Heads and Roof</b>			
6	Free of visible signs of coating failure?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
7	Free of noticeable distortions, buckling, denting, or bulging?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
8	Free of standing water on roof?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
9	Are all labels and tags intact and legible?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Tank Manways, Piping, and Equipment</b>			
10	Flanged connection bolts tight and fully engaged with no sign of wear or corrosion?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Tank Equipment</b>			
11	Normal and emergency vents free of obstructions?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
12	Normal vent on tanks storing gasoline equipped with pressure/vacuum vent?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
13	Are flame arrestors free of corrosion and are air passages free of blockage?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
14	Is the emergency vent in good working condition and functional, as required by manufacturer? Consult manufacturer's requirements. Verify that components are moving freely (including long-bolt manways).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
15	Is interstitial leak detection equipment in good condition? Are windows on sight gauges clear? Are wire connections intact? If equipment has a test function, does it activate to confirm operation?"	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

16	Are all valves free of leaks, corrosion and other damage? Follow manufacturers' instructions for regular maintenance of these items. Check the following and verify (as applicable): <input type="checkbox"/> Anti-siphon valve <input type="checkbox"/> Check valve <input type="checkbox"/> Gate valve <input type="checkbox"/> Pressure regulator valve <input type="checkbox"/> Expansion relief valve <input type="checkbox"/> Solenoid valve <input type="checkbox"/> Fire valve <input type="checkbox"/> Shear valve	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
17	Are strainers and filters clean and in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Insulated Tanks</b>			
18	Free of missing insulation? Insulation free of visible signs of damage? Insulation adequately protected from water intrusion?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
19	Insulation free of noticeable areas of moisture?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
20	Insulation free of mold?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
21	Free of visible signs of coating failure?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Tank / Piping Release Detection</b>			
22	Is inventory control being performed and documented if required?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
23	Is release detection being performed and documented if required?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
<b>Other Equipment</b>			
24	Are electrical wiring and boxes in good condition?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
25	Has the cathodic protection system on the tank been tested as required by the designing engineer?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Additional Comments:

## STI SP001 Portable Container Monthly Inspection Checklist

### General Inspection Information:

Inspection Date: _____	Prior Inspection Date: _____	Retain until date: _____
Inspector Name (print): _____	Title: _____	
Inspector's Signature ( ): _____		
Container(s) inspected ID _____		
Regulatory facility name and ID number (if applicable) _____		

### Inspection Guidance:

- This checklist is intended as a model. Locally developed checklists are acceptable as long as they are substantially equivalent (as applicable).
- This periodic inspection is intended for monitoring the external condition and its containment structure. This visual inspection does not require a Certified Inspector. It shall be performed by an owner's inspector who is familiar with the site and can identify changes and developing problems. Note the non-conformance and corresponding corrective action in the comment section.
- Retain the completed checklists for at least 36 months.

Item	Area:	Area:	Area:	Area:
<b>Portable Container Containment/Storage Area</b>				
1 Are all portable container(s) within designated storage area?	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
2 Is the containment and storage area free of excess liquid, debris, cracks or fire hazards?	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
3 Are drain valves closed and in good working condition?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
4 Are containment egress pathways clear and any gates/doors operable?	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> N/A
<b>Container</b>				
5 Is the container free of leaks? <i>Note: If "No", identify container and describe leak.</i>	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No
6 Is the container free of distortions, buckling, denting or bulging?	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No	<input type="radio"/> Yes <input type="radio"/> No

This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

**Appendix D**

**Record of Discharge Prevention**

**Briefings and Training**

## Example Record of Training

Briefings will be scheduled and conducted by the Facility owner or operator for operating personnel at regular intervals to ensure adequate understanding of this SPCC Plan. The briefings will also highlight and describe known discharge events or failures, malfunctioning components, and recently implemented precautionary measures and best practices. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharge of oil, and in applicable pollution laws, rules, and regulations. Facility operators and other personnel will have an opportunity during the briefings to share recommendations concerning health, safety, and environmental issues encountered during facility operations. Check contact information for key employees and response/cleanup contractors and update them in the Plan as needed. Training may be combined with 29 CFR 1910.1200 training provided SPCC Plan and Spill Response are both indicated on subject lines.

<b>Chemtool Inc.</b> Rockton, IL	
<b>Date of Training:</b>	<b>Conducted by:</b>
<b>Subject(s):</b>	
1.	4.
2.	5.
3.	6.
<b>Attendee Sign-In:</b>	
1.	7.
2.	8.
3.	9.
4.	10.
5.	11.
6.	12.
<b>Recommendations and Suggestions:</b>	



**Appendix E**  
**Plan Review Log**

## Chemtool Inc.

Note: Signature indicates that a review and evaluation has been completed and whether the Plan was amended.

[illegible]

## **Appendix F**

### **Emergency Contacts**

## Emergency Coordinators - Internal

Primary - Sean Stadler, Operations Manager, Chemtool  
(815) 389-0177 - Office

(b) (6)

Alternate - Josh Turnbull, Manufacturing Manager, Rockton  
(815) 389-0178 - Office

(b) (6)

FOR INTERNAL  
USE ONLY

**FOR EMERGENCY COORDINATOR USE ONLY**  
**Emergency Use Index**

**Emergency Reporting and Coordination**

National Response Center (NRC)	(800) 424-8802
Rockton Fire Protection District - Emergency	911
Rockton Fire Protection District - Non-Emergency	(815) 624-6010
Rockton Police Department - Emergency	911
Rockton Police Department - Non-Emergency	(815) 624-4351
IEMA Spill Reporting	(800) 782-7860
Winnebago County Emergency Management	(815) 319-6313

**Emergency**

Medical Emergency	911
Beloit Health System	(608) 364-5011
Spill Cleanup Contractor	
Trans Environmental	(815) 885-4840 - 24 Hour

**Emergency**

Environmental Consultant	
Fehr Graham Freeport Office	(815) 235-7643 or
Fehr Graham Rockford Office	(815) 394-4700

**Emergency Pollutant Hazards Reporting Information**

National Response Center (NRC)	(800) 424-8802
USEPA Region 5 Emergency Response Center	(312) 353-2318

See Appendix J for information regarding Federal and State Spill Reporting Requirements.

**Appendix G**

**Professional Engineer Certification(s) and Manager**

**Approval(s)**

**Professional Engineer Certification  
and Management Approval**

**Professional Engineer's Certification**

I hereby attest I am familiar with the requirements of Part 112 of 40 CFR. A duly authorized agent has visited and examined the Facility, and this Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards and in accordance with the requirements of Part 112. Procedures for required inspections and testing have been established and are outlined in the Plan, and this Plan is adequate for the Facility. This certification shall in no way relieve the owner or operator of this Facility of his or her duty to prepare and fully implement such Plan. I am a duly Registered Professional Engineer under the laws of the State of Illinois. My seal and registration number appear below.


Date: 9/27/19  
Signature: *Andrew J. Reeter*  
Name: Andrew J. Reeter, P.E.  
Registration No. 062-061732, Expiration 11/19

SEAL



### Management Approval

This SPCC Plan has been reviewed and approved by management at a level with the authority to commit necessary resources for implementing the Plan. The programs and procedures outlined in the Plan will be implemented and periodically reviewed and, if necessary, updated in accordance with 40 CFR Part 112, as amended, and applicable state and local requirements.

Signature: 

Name:

(Printed)

Sean Stadler

Title:

Operations Manager

Date:

10-3-19

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

(Printed) \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

(Printed) \_\_\_\_\_

Title: \_\_\_\_\_

Date: \_\_\_\_\_



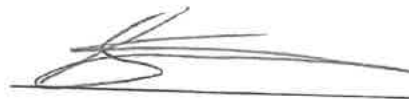
## **Appendix H**

### **Notice to Petroleum Product Drivers**

## Notice to Petroleum Product Drivers

To prevent the release of substances hazardous to the environment, drivers entering this Facility are to comply with the following rules:

1. Exercise caution when maneuvering to avoid damage to containment walls.
2. Place drip pans under all pump hose fittings prior to loading/unloading.
3. Block truck wheels before starting to load/unload. Set brakes.
4. Remain with the vehicle while loading/unloading.
5. Drain loading/unloading line to storage tank.
6. Verify that all drain valves are closed before disconnecting loading/unloading lines.
7. Inspect vehicle before departure to be sure all loading/unloading lines have been disconnected and vent valves are closed.
8. Immediately report any leakage or spillage to the Spill Prevention and Emergency Coordinator or other management personnel.

 10-3-19  
\_\_\_\_\_  
Spill Prevention and Emergency Coordinator  
Chemtool Inc.

**Appendix I**

**Discharge Response Equipment**

### Communications and Response

Internal plant communications are available through the telephone PA system. This allows voice contact in the event of a spill to notify all Facility personnel on any plant telephone and calmly stating the nature and location of the emergency. Emergency Coordinators are also available through the Facility paging system. The following items are located throughout the Facility where deemed necessary to assist in the performance of this Plan.

### Clothing

Goggles - This device protects the eyes and face from potential splashes and contact with materials, while allowing full visibility for working.

Boots - These solvent-resistant boots are large enough for personnel to wear over regular footwear. They would prevent cleanup personnel from contaminating their footwear in a liquid spill.

Gloves - These solvent-resistant gloves protect to the forearm and are used to preclude exposure to hazardous materials.

Face Shield - This device protects the eyes and face from potential splashes and contact with materials, while allowing full visibility for working.

Protective Suit - This suit covers the body excluding the hands, feet, and face from contamination. It is disposable and is resistant to liquids and solvents.

Face Mask - This breathing apparatus is designed to fit over the nose and mouth and filters air by means of dual replaceable carbon cartridges. This would be used when vapors from solvents in confined areas might cause breathing difficulty or a hazard to the individual.

### Equipment

Wet/Dry Vacuum - The function of this device is to remove and contain liquid or dry material.

Absorbent Socks - This material is capable of absorbing hazardous waste liquids found at the manufacturing Facility. The function of this material is to contain a liquid spill for proper cleanup and disposal.

Shovel - This shovel has a long handle and has a flat blade. This tool would be used for removing dry material from a surface or moving a liquid toward a location.

Broom - This broom has a long handle and has a flat brush surface. This tool would be used to collect absorbent material or other dry materials.

Fire Extinguisher - This multi-purpose (ABC) portable extinguisher is available to fight a fire which might occur during spill containment or collection.

Rubber Floor Squeegee - This device has a long handle and a rubber blade. This tool would be used for moving liquid material along a surface from one point to another.

### Materials

Bag of Floor Dry - This product is a standard clay-based industrial absorbent material. It would be used to absorb a spill, and to provide a temporary dike for spilled liquids.

Shop Towels - These non-disposable towels would be used to decontaminate non-disposable emergency equipment.

**Appendix J**  
**Spill Reporting Information**

## Discharge From Facility Notification Form

Part A: Discharge Information		
<b>General information when reporting a spill to outside authorities:</b> Name: Rockton Inc. Address: 1165 Prairie Hill Rd. Rockton, Illinois 61072 Telephone: (815) 957-4140		
Type of oil:	Discharge Date and Time:	
Quantity released:	Discovery Date and Time:	
Quantity released to a water body:	Discharge Duration:	
Location/Source:		
Actions taken to stop, remove, and mitigate impacts of the discharge:		
<b>Affected media:</b> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <input type="checkbox"/> air  <input type="checkbox"/> water  <input type="checkbox"/> soil </div> <div style="width: 45%;"> <input type="checkbox"/> storm water sewer/POTW  <input type="checkbox"/> dike/berm/oil-water separator  <input type="checkbox"/> other: _____ </div> </div>		
Notification person:	Telephone contact: Business: 24-hr:	
Nature of discharges, environmental/health effects, and damages:		
Injuries, fatalities or evacuation required?		
Part B: Notification Checklist		
	Date and time	Name of person receiving call
<b>1) Discharge in any amount</b>		
Emergency Coordinator		
<b>2) 1,000-gallon discharge OR 42 gallons in each of 2 events within 12 consecutive months</b>		
Regional Administrator, EPA Region 5 (800) 621-8431		
<b>3) Discharge in any amount and affecting (or threatening to affect) a water body - Contact all three Agencies</b>		
Winnebago County Emergency Management Agency (920) 727-2880		
Illinois Emergency Management (800) 782-7860 [24-hr hotline]		
National Response Center (800) 424-8802 [24-hr number]		
**Note: if #2 above is also true, contact NRC and EPA Region		



## ILLINOIS EMERGENCY MANAGEMENT AGENCY

**Bruce Rauner**  
Governor

**James K. Joseph**  
Director

### EMERGENCY RELEASE NOTIFICATION FACT SHEET

- A. Immediate telephone notification shall be given by the owner or operator of a facility when a release equal to or exceeding the reportable quantity of an extremely hazardous substance<sup>1</sup> or a CERCLA hazardous substance<sup>2</sup> occurs at the facility.

In such incidents, notifications are to be made to the following:

1. Illinois Emergency Management Agency (IEMA)/State Emergency Response Commission (SERC) at 1-800-782-7860 (within state) or (217) 782-7860 (when calling from out-of-state);
2. Local Emergency Planning Committee (LEPC) that is likely to be affected by the release. The LEPC telephone number(s) may be obtained from the IEMA Website at <http://www.illinois.gov/icma/Preparedness/SERC/Pages/default.aspx>.
3. National Response Center (NRC) at 1-800-424-8802 (if the substance is a CERCLA hazardous substance).

Please Note: *Transportation-related incidents only require 9-1-1 notification.*

- B. Immediate telephone notification is also required if an incident or accident involving a hazardous material<sup>3</sup> occurs which results in:

- 1) a member of the general public is killed;
- 2) a member of the general public receives injuries requiring hospitalization;
- 3) an authorized official of an emergency agency recommends an evacuation of an area by the general public;
- 4) a motor vehicle has overturned on a public highway;
- 5) Fire, breakage, release or suspected contamination occurs involving an etiologic agent;
- 6) Any release of petroleum (or oil) that produces a sheen on nearby surface water<sup>4</sup> and/or threatens navigable waters;
- 7) Any spill or overflow of petroleum that results in a release to the environment that exceeds 25 gallons (25-gallon reporting threshold for USTs only).<sup>4</sup> ASTs are not subject to the 25-gallon spill reporting threshold in 41 IAC 176.340 but are subject to 29 IAC 430.

In such incidents, notification shall be made as noted in Paragraph A, above, except no notification is required to the NRC, except items 6 and 7 (oil that impacts water and overfills emanating from underground storage tanks).

At a minimum, notification shall include:

- 1) the chemical name or identity of any substance involved in the release;
- 2) an indication of whether the substance is an extremely hazardous substance;
- 3) an estimate of the quantity in pounds of any such substance that was released into the environment;
- 4) the time and duration of the release;
- 5) the specific location of the release;
- 6) the medium or media (air, land, water) into which the release occurred;
- 7) any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals;
- 8) proper precautions to take as a result of the release, including evacuations;
- 9) the name and telephone number of the person or persons to be contacted for further information.

WRITTEN FOLLOW-UP NOTICE IS REQUIRED WITH RESPECT TO INCIDENTS AS DESCRIBED IN PARAGRAPH A, ABOVE. As soon as practicable after such release (within 30 days), the owner or operator shall provide a written follow-up emergency notice (or notices, as more information becomes available) to the SERC and the LEPC, updating the information provided in the immediate notification and including additional information with respect to:

- 1) Actions taken to respond to and contain the release;
- 2) Any known or anticipated acute or chronic health risks associated with the release;
- 3) Where appropriate, advice regarding medical attention necessary for exposed individuals.

<sup>1</sup> See 40 CFR 355 for a listing of extremely hazardous substances (EHS).

<sup>2</sup> See 40 CFR 302.4 for a listing of Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) hazardous substances.

<sup>3</sup> See 49 CFR 172.101 for a list of hazardous materials.

<sup>4</sup> See 41 IAC 176.340 Reporting and Cleanup of Spills and Overfills (USTs).

(These rules are compiled in 29 IAC 430 and 29 IAC 620)

Last updated 4/2016

1035 OUTER PARK DRIVE | SPRINGFIELD, IL 62704 | 217.782.2700

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## **Appendix L**

### **Bulk Storage Containers Inspection Schedule**

Appendix L  
Bulk Storage Containers Inspection Schedule

Tank ID	Contents	Tank Size (Gallons)	STI SP-001 AST Category	Last Inspected	Next Formal External Inspection Date
	Water	8,000	1	N/A	N/A
50-01	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-02	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-03	TEA	50,000	1	10/1/2009	9/26/2029
50-04	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-05	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-06	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-07	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-08	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-09	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-10	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-11	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-12	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-13	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-14	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-15	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-16	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-17	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-18	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-19	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-20	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-21	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-22	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-23	Waste Oil	50,000	1	10/1/2009	9/26/2029
50-24	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-25	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-26	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-27	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-28	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-29	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-30	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-38	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-39	(b)(4)	50,000	1	10/1/2009	9/26/2029
50-40	(b)(4)	50,000	1	10/1/2009	9/26/2029
K-108	blending kettle	6,000	1	2/1/2019	2/1/2039
BT-Resin	Pet Resin	9,000	1	1/1/2009	12/27/2028
None	empty	8,500	1	N/A	N/A
None	Water Storage	50,000	1	N/A	N/A
S-1	Slurry Kettle	2,500	1	8/20/2015	8/15/2035
S-2	Slurry Kettle	2,300	1	8/20/2015	8/15/2035
R-1201	Cooking Reactor	14,376	1	10/15/2015	10/10/2035
FK-1202	Finishing Kettle	14,376	1	6/3/2015	5/29/2035
FK-1203	Finishing Kettle	14,376	1	10/15/2015	10/10/2035
H001	Homogenizer (Mill)	55	1	N/A	N/A
LK-1	Lithium Kettle	1,200	1	8/20/2015	8/15/2035
R-1204	Cooking Reactor	14,376	1	5/30/2015	5/25/2035
FK-1205	Finishing Kettle	14,376	1	6/4/2015	5/30/2035
FK-1206	Finishing Kettle	16,772	1	6/4/2015	5/30/2035
H002	Homogenizer (Mill)	55	1	N/A	N/A
R-1207	Cooking Reactor	14,376	1	5/30/2015	5/25/2035
FK-1208	Finishing Kettle	14,376	1	6/4/2015	5/30/2035
FK-1209	Finishing Kettle	16,772	1	6/4/2015	5/30/2035
H003	Homogenizer (Mill)	55	1	N/A	N/A
S-3	Slurry Kettle	276	1	8/20/2015	8/15/2035
R-1210	Cooking Reactor	14,376	1	5/13/2015	5/8/2035
FK-1211	Finishing Kettle	14,376	1	5/28/2015	5/23/2035
FK-1212	Finishing Kettle	14,376	1	6/4/2015	5/30/2035
H004	Homogenizer (Mill)	55	1	N/A	N/A

Appendix L  
Bulk Storage Containers Inspection Schedule

Tank ID	Contents	Tank Size (Gallons)	STI SP-001 AST Category	Last Inspected	Next Formal External Inspection Date
FK-501	Finishing Kettle	4,552	1	6/6/2015	6/1/2035
FK-502	Finishing Kettle	4,792	1	6/5/2015	5/31/2035
FK-503	Finishing Kettle	4,792	1	6/5/2015	5/31/2035
H005	Homogenizer (Mill)	55	1	N/A	N/A
RC-101W	Contractor Reactor	1,840	1	5/26/2015	5/25/2035
FK-504	Finishing Kettle	4,552	1	6/5/2015	5/31/2035
FK-505	Finishing Kettle	4,792	1	11/11/2015	11/6/2035
FK-506	Finishing Kettle	4,792	1	6/5/2015	5/31/2035
RC-102E	Contractor Reactor	1,500	1	N/A	N/A
FK-507	Finishing Kettle	4,552	1	6/6/2015	6/1/2035
FK-508	Finishing Kettle	2,156	1	6/6/2015	6/1/2035
FK-509	Finishing Kettle	2,156	1	6/8/2015	6/3/2035
H006	Homogenizer (Mill)	55	1	N/A	N/A
FK-510	Finishing Kettle	2,636	1	6/8/2015	6/3/2035
FK-511	Finishing Kettle	2,636	1	10/16/2015	10/11/2035
FK-512	Finishing Kettle	2,636	1	10/16/2015	10/11/2035
H007	Homogenizer (Mill)	55	1	N/A	N/A
FK-513	Finishing Kettle	6,000	1	6/8/2015	6/3/2035
FK-514	Finishing Kettle	10,000	1	6/8/2015	6/3/2035
FK-515	Finishing Kettle	10,000	1	6/8/2015	6/3/2035
H008	Homogenizer (Mill)	55	1	N/A	N/A
RC-601	(b)(4)	6,000	1	5/30/2015	5/25/2035
H009	Homogenizer (Mill)	55	1	N/A	N/A
R-604	(b)(4)	6,000	1	5/31/2015	5/26/2035
FK-605	Ca/Lith Finish	5,387	1	6/13/2015	6/8/2035
LK-2	lithium kettle	1,200	1	8/20/2015	8/15/2035
S-4	Slurry Kettle	2,300	1	8/20/2015	8/15/2035
R-1213	Cooking Reactor	14,376	1	5/28/2015	5/23/2035
FK-1214	Finishing Kettle	16,772	1	6/4/2015	5/30/2035
FK-301	Finishing Kettle	2,636	1	6/6/2015	6/1/2035
H010	Homogenizer (Mill)	55	1	N/A	N/A
R-607	Cooking Reactor	4,792	1	5/31/2015	5/26/2035
FK-608	Finishing Kettle	4,792	1	6/13/2015	6/8/2035
H011	Homogenizer (Mill)	55	1	N/A	N/A
GR-1	(b)(4)	5,391	1	N/A	N/A
GR-2	(b)(4)	5,391	1	N/A	N/A
GR-3	(b)(4)	5,391	1	N/A	N/A
GR-4	(b)(4)	5,391	1	N/A	N/A
GR-5	(b)(4)	5,391	1	N/A	N/A
GR-6	(b)(4)	5,391	1	N/A	N/A
GR-7	(b)(4)	4,313	1	N/A	N/A
GR-8	(b)(4)	4,313	1	N/A	N/A
GR-9	(b)(4)	4,313	1	N/A	N/A
GR-10	Purge Tank	4,313	1	N/A	N/A
GR-11	(b)(4)	5,391	1	N/A	N/A
GR-12	(b)(4)	5,391	1	N/A	N/A
MC-1	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-2	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-3	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-4	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-5	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-6	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-7	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-8	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-9	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-10	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-11	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-12	(b)(4)	17,970	1	1/1/2010	12/27/2029

Appendix L  
Bulk Storage Containers Inspection Schedule

Tank ID	Contents	Tank Size (Gallons)	STI SP-001 AST Category	Last Inspected	Next Formal External Inspection Date
MC-13	empty	17,970	1	1/1/2010	12/27/2029
MC-14	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-15	(b)(4)	17,970	1	1/1/2010	12/27/2029
MC-16	Lithium Amber (b)(4)	17,970	1	1/1/2010	12/27/2029
MC-17	(b)(4)	5,391	1	N/A	N/A
MC-18	(b)(4)	5,391	1	N/A	N/A
MC-19	(b)(4)	5,391	1	N/A	N/A
MC-20	(b)(4)	5,391	1	N/A	N/A
MC-21	empty	5,391	1	N/A	N/A
MC-22	(b)(4)	5,391	1	N/A	N/A
MC-23	(b)(4)	5,391	1	N/A	N/A
MC-24	empty	5,391	1	N/A	N/A
MC-25	(b)(4)	5,391	1	N/A	N/A
MC-26	(b)(4)	5,391	1	N/A	N/A
MC-27	(b)(4)	5,391	1	N/A	N/A
MC-28	(b)(4)	4,313	1	N/A	N/A
MC-29	(b)(4)	5,391	1	N/A	N/A
MC-30	(b)(4)	5,391	1	N/A	N/A
MC-31	empty	empty		N/A	N/A
N/A	storage tank	6,500	1	N/A	N/A
N/A	storage tank	6,500	1	N/A	N/A

Appendix L  
Bulk Storage Containers Inspection Schedule

Tank ID	Contents	Tank Size (Gallons)	STI SP-001 AST Category	Last Inspected	Next Formal External Inspection Date
PK-3	empty	300		N/A	N/A
RPK-1	empty, never used	48		N/A	N/A
FK-702	Mixing Tanks	839	1	8/22/2018	8/17/2038
PK-1	Mixing Tanks	359	1	10/16/2015	10/11/2035
DL-261	Mixing Tanks	2,156	1	5/31/2015	5/26/2035
FK-701	Mixing Tanks	839	1	9/25/2015	9/20/2035
R-300	Mixing Tanks	2,396	1	12/27/2018	12/22/2038
DL-260	Mixing Tanks	2,156	1	10/18/2018	10/13/2038
BT 9-10	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-9	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-8	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-7	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-6	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-5	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-4	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-15	(b)(4)	9,000	1	1/1/2009	12/27/2028
WS606	not hooked up	2,500	1	N/A	N/A
K110	blending kettle	2,000	1	2/26/2019	2/21/2039
K114	blending kettle	1,500	1	9/4/2018	8/30/2038
BT 9-3	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-2	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-1	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-11	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-12	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT 9-13	(b)(4)	9,000	1	1/1/2009	12/27/2028
BT6-2	Diesel Exhaust Fluid (b)(4)	6,000	1	N/A	N/A
DL266	corrosion inhibitor (b)(4)	6,000	1	N/A	N/A
WS1001	blending kettle	6,000	1	N/A	N/A
WS602	blending kettle	6,000	1	8/19/2018	8/14/2038
WS603	blending kettle	3,000	1	11/14/2017	11/9/2037
WS1004	blending kettle	10,000	1	N/A	N/A
WS1005	blending kettle	10,000	1	N/A	N/A
WS 1501	(b)(4)	2,500	1	N/A	N/A
BT 9-14	Diisopropanolamine	9,000	1	1/1/2009	12/27/2028
SS57	blending kettle	2,500	1	9/25/2018	9/25/2038
SS4	blending kettle	110	1	N/A	N/A
SS15	blending kettle	1,000	1	9/28/2017	9/28/2037
ON-1006	blending kettle	10,000	1	9/13/2018	9/8/2038
ON-605	blending kettle	6,000	1	5/17/2016	5/12/2036
ON-604	blending kettle	6,000	1	5/17/2016	5/12/2036
ON-1003	blending kettle	10,000	1	10/2/2018	9/27/2038
ON-1002	blending kettle	10,000	1	10/3/2018	9/28/2038
ON-1001	blending kettle	10,000	1	10/4/2018	9/29/2038
BT 20-1	(b)(4)	20,000	1	2/16/2016	2/11/2036
BT 20-2	(b)(4)	20,000	1	2/16/2016	2/11/2036

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Bulk Storage Containers Inspection Schedule

Tank ID	Contents	Tank Size (Gallons)	STI SP-001 AST Category	Last Inspected	Next Formal External Inspection Date
BT 20-3	(b)(4)	20,000	1	2/16/2016	2/11/2036
BT 20-4	(b)(4)	20,000	1	2/16/2016	2/11/2036
BT 20-5	TEA 99%	20,000	1	2/16/2016	2/11/2036
K-113	blending kettle	2,000	1	8/20/2015	8/15/2035
K-112	blending kettle	2,000	1	8/20/2015	8/15/2035
ON-611	blending kettle	6,300	1	5/17/2016	5/12/2036
ON-601	blending kettle	6,300	1	5/17/2016	5/12/2036
ON-1007	blending kettle	10,000	1	10/17/2018	10/12/2038
ON-608	blending kettle	6,000	1	5/17/2016	5/12/2036
ON-609	blending kettle	6,000	1	5/17/2016	5/12/2036
ON-610	blending kettle	6,000	1	5/17/2016	5/12/2036
ON-612	blending kettle	6,300	1	5/17/2016	5/12/2036
CTG-2	blending kettle	6,300	1	2/18/2019	2/18/2039
CTG-1	blending kettle	6,000	1	2/18/2019	2/18/2039
DI	Water	6,500	1	3/18/2015	3/13/2035
DLK-263	Blending Kettle	2,100	1	2/19/2019	2/14/2039
DLK-264	Blending Kettle	6,500	1	2/19/2019	2/19/2039
DLK-109	Blending Kettle	2,000	1	2/19/2019	2/19/2039
Resin Tank	Blending Kettle	6,000	1	N/A	N/A
DL265	(b)(4)	9,000	1	1/1/2019	12/27/2038
DL273	(b)(4)	6,500	1	N/A	N/A
DL272	bright stock emulsion	6,500	1	N/A	N/A
DL270	50% emulsion (b)(4)	6,500	1	N/A	N/A
DL267, 268	emulsion (b)(4)	2,400	1	N/A	N/A
DL274	Vegetable emulsion	6,500	1	N/A	N/A
GR13	Grease Tank	5,396	1	N/A	N/A
GR14	Grease Tank	5,396	1	N/A	N/A
H012	Homogenizer (Mill)	55	1	N/A	N/A
FK606	Finishing Kettle	4,796	1	N/A	N/A
FK610	Finishing Kettle	4,796	1	N/A	N/A
R611	Grease Reactor	4,796	1	N/A	N/A
FK612	Finishing Kettle	4,796	1	N/A	N/A
H019	Homogenizer (Mill)	55	1	N/A	N/A
R614	Grease Reactor	4,796	1	N/A	N/A
FK615	Finishing Kettle	4,796	1	N/A	N/A
H023	Homogenizer (Mill)	55	1	N/A	N/A
AS01	Finishing Kettle	5,400	1	N/A	N/A
AS02	Finishing Kettle	5,400	1	N/A	N/A
AS03	Finishing Kettle	4,800	1	N/A	N/A
R701	Finishing Kettle	5,400	1	9/17/2018	9/17/2038

Appendix L  
Bulk Storage Containers Inspection Schedule

Tank ID	Contents	Tank Size (Gallons)	STI SP-001 AST Category	Last Inspected	Next Formal External Inspection Date
H015	Homogenizer (Mill)	55	1	N/A	N/A
R702	Homogenizer (Mill)	600	1	N/A	N/A
H016	Homogenizer (Mill)	55	1	N/A	N/A
AS04	Finishing Kettle	5,400	1	N/A	N/A
H018	Homogenizer (Mill)	55	1	N/A	N/A
H017	Homogenizer (Mill)	55	1	N/A	N/A
GS102	Grease	360	1	N/A	N/A
SS1	Grease	450	1	N/A	N/A
FK616	Grease	4,796	1	6/13/2015	6/13/2035
FK618	Grease	4,796	1	6/13/2015	6/13/2035
FK619	Grease	4,796	1	6/13/2015	6/13/2035
FK600	Grease	4,796	1	6/13/2015	6/13/2035
Oil Expansion Tank	Hydraulic Oil	1,200	1	N/A	N/A
(2) Hot Oil (boilers)	Hydraulic Oil	300 ea	1	N/A	N/A

Indicates vessel contains grease - is not flowable at normal temperatures and inspections are not required

Indicates vessel contains water-based fluids and inspection is not required

## **Appendix K**

### **Oil Containers & Oil-Containing Equipment List**



### Appendix K

#### Oil Containers Oil-Containing Equipment List

[illegible]

Appendix K  
Oil Containers Oil-Containing Equipment List

Zone (Site Map)	Tank ID	Tank Size (Gallons)	Contents/ Description	Vessel Description	Containment	Direction of Flow	Max Discharge Rate	Overfill Protection
1	H001	55	Homogenizer (Mill)	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
1	LK-1	1200	Lithium Kettle	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
1	R-1204	14,376	Cooking Reactor	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
1	FK-1205	14,376	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
1	FK-1206	16,772	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
1	H002	55	Homogenizer (Mill)	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
1	GR-1	5,391	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	Gauge
1	GR-2	5,391	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	Gauge
1	GR-3	5,391	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	Gauge
1	GR-4	5,391	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	Gauge
1	GR-5	5,391	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	Gauge
1	GR-6	5,391	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	Gauge
1	GR-7	4,313	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	Gauge
1		16,720	empty grease totes	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
1		14,060	empty grease totes	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
1	Rack Z & Y	21,120	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
1	Rack X & W	0	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
1	Rack V & U	14,060	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
1	N/A		Raw materials/ finished product	Relicer	Same containment as Tanks 1-36	Within Containment/ Building	Gradual to instantaneous	N/A
2	R-1207	14,376	Cooking Reactor	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
2	FK-1208	14,376	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
2	FK-1209	16,772	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
2	H003	55	Homogenizer (Mill)	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
2	S-3	276	Slurry Kettle	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
2	R-1210	14,376	Cooking Reactor	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge
2	FK-1211	14,376	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4" high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to instantaneous	Gauge

### Appendix K

#### Oil Containers Oil-Containing Equipment List

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Appendix K  
Oil Containers Off-Containing Equipment List

Zone (Site Map)	Tank ID	Tank Size (Gallons)	Contents/ Description	Vessel Description	Containment	Direction of Flow	Max Discharge Rate	Overfill Protection
2	H007	55	Homogenizer (Mill)	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK-513	6,000	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK-514	10,000	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK-515	10,000	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H008	55	Homogenizer (Mill)	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	RC-601	6,000	(b)(4)	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H009	55	Homogenizer (Mill)	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	R-604	6,000	(b)(4)	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK-605	5387	(b)(4)	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	LK-2	1200	lithium kettle	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	S-4	2300	Slurry Kettle	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	R-1213	14,376	Cooking Reactor	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK-1214	16,772	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK-301	2636	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H010	55	Homogenizer (Mill)	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	R-607	4792	Cooking Reactor	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK-508	4792	Finishing Kettle	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H011	55	Homogenizer (Mill)	process vessel	Passive Containment - graded pavement south of building; 4' high concrete sloped berm - all spills contained in sloped area of building. There is a containment trench near the doorway as an extra precaution.	Within Containment/ Building	Gradual to Instantaneous	Gauge



Appendix K  
Oil Containers Oil-Containing Equipment List

Zone (Site Map)	Tank ID	Tank Size (Gallons)	Contents/ Description	Vessel Description	Containment	Direction of Flow	Max Discharge Rate	Overfill Protection
2	GR-8	4,313	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	GR-9	4,313	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	GR-10	4,313	Purge Tank	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	GR-11	5,391	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	GR-12	5,391	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	N/A	6500	storage tank	bulk storage container	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	N/A	6500	storage tank	bulk storage container	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	PK-3	300	empty	process vessel-pilot plant	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	RPK-1	48	empty, never used	process vessel-pilot plant	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	PK-702	839	Mixing Tanks	process vessel-pilot plant	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	PK-1	359	Mixing Tanks	process vessel-pilot plant	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	DL-261	2,156	Mixing Tanks	process vessel-pilot plant	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	PK-701	839	Mixing Tanks	process vessel-pilot plant	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	R-300	2,396	Mixing Tanks	process vessel-pilot plant	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	DL-260	2,156	Mixing Tanks	process vessel-pilot plant	Active Containment; spill kits and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	GR13	5,396	Grease Tank	bulk storage container	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	GR14	5,396	Grease Tank	bulk storage container	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H012	55	Homogenizer (MIL)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK606	4,796	Finishing Kettle	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK610	4,796	Finishing Kettle	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	RS11	4,796	Grease Reactor	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK612	4,796	Finishing Kettle	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H019	55	Homogenizer (MIL)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	R614	4,796	Grease Reactor	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK615	4,796	Finishing Kettle	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H023	55	Homogenizer (MIL)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	AS01	5,400	Finishing Kettle	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	AS02	5,400	Finishing Kettle	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	AS03	4,800	Finishing Kettle	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	R701	5,400	Finishing Kettle	Process kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H015	55	Homogenizer (MIL)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	R702	600	Homogenizer (MIL)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H016	55	Homogenizer (MIL)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	AS04	5,400	Finishing Kettle	Reactor finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H018	55	Homogenizer (MIL)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	H017	55	Homogenizer (MIL)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	GS102	360	Grease	Grease finishing kettle	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	SS1	450	Grease	Fluids blending tank	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2		19,360	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		7,040	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		52,800	rinse totes	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2	Rack T & S	10,560	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2	Rack R & Q	10,560	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2	Rack P & O	10,560	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2	Rack N & M	10,560	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2	Rack L	10,560	raw materials	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		209,000	purge drums	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		9,680	fluids finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		2,640	fluids finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		68,640	rinse totes	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		33,000	grease finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		14,080	fluids finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		26,400	fluids finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		30,800	fluids finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A

Appendix K  
Oil Containers Oil-Containing Equipment List

Zone (Site Map)	Tank ID	Tank Size (Gallons)	Contents/ Description	Vessel Description	Containment	Direction of Flow	Max Discharge Rate	Overfill Protection
2		30,800	fluids finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2		260,700	fluids finished goods	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
2		71,720	quarantine	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
2			packaging material	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
2	FK516	4,796	grease finishing kettle	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK518	4,796	grease finishing kettle	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK519	4,796	grease finishing kettle	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
2	FK600	4,796	grease finishing kettle (not yet operational)	process vessel	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-10	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-9	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-8	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-7	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-6	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-5	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-4	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-15	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	WS606	2900	not hooked up	slurry tank	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	K110	2000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	K114	1,500	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-3	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-2	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-1	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-11	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-12	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT 9-13	9,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	BT5-2	6000	Water-based fluid	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways + 2,472 sq ft x 0.5 ft high = approx. 9,294 gallons	Within Containment/ Building	Gradual to Instantaneous	Gauge

Appendix K  
Oil Containers Oil-Containing Equipment List

Zone (Site Map)	Tank ID	Tank Size (Gallons)	Contents/ Description	Vessel Description	Containment	Direction of Flow	Max Discharge Rate	Overfill Protection
3	DL306	6,000	(b)(4)		Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	WS1001	5,000	corrosion inhibitor	bulk storage container				
3	WS602	6,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	WS603	3,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	WS1004	10,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	WS1005	10,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	WS 1501	2,500	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	BT 9-14	9,000	Diisopropanolamine	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	SS57	2500	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	SS4	110	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	SS15	1,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	ON-1006	10,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	ON-605	6,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	ON-604	6,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	ON-1003	10,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	ON-1002	10,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	ON-1001	10,000	blending kettle	process vessel	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	BT 20-1	20,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	BT 20-2	20,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	BT 20-3	20,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge
3	BT 20-4	20,000	(b)(4)	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to instantaneous	Gauge

Appendix K  
Oil Containers Oil-Containing Equipment List[illegible]



Appendix K  
Oil Containers Off-Containing Equipment List

Zone (Site Map)	Tank ID	Tank Size (Gallons)	Contents/ Description	Vessel Description	Containment	Direction of Flow	Max Discharge Rate	Overfill Protection
3	DL267, 268	2,400	790 emulsion	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
3	DL274	6,500	Water-based fluid	bulk storage container	Passive Containment - graded pavement south of building; 46.5' x 1' x 0.5' trench + 20' x 1' x 0.5' near entrways and building act as containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
3		30,800	fluids finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	N/A
3		30,800	fluids finished goods	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3	Rack J & I	30,800	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		13,200	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		13,200	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		14,080	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3	Rack H & G	30,800	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3	Rack F & E	30,800	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3	Rack D & C	30,800	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3	Rack A & B	30,800	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		34,320	empty drums/totes and waste water	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		11,440	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		26,400	raw materials	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		6,600	partial drums / finished goods	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		10,560	partial drums / finished goods	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
3		5,280	partial drums / finished goods	portable container area	Building acts as secondary containment & containment trenches by doorway	Within Containment/ Building	Gradual to Instantaneous	N/A
4	MC-1	17,970	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
4	MC-2	17,970	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
4	MC-3	17,970	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
4	MC-4	17,970	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
4	MC-5	17,970	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
4	MC-6	17,970	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge
4	MC-7	17,970	(b)(4)	bulk storage container	Active Containment; Building acts as secondary containment	Within Containment/ Building	Gradual to Instantaneous	Gauge

Appendix K  
Oil Containers Off-Containing Equipment List

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Appendix K  
Oil Containers Oil-Containing Equipment List

Zone (Site Map)	Tank ID	Tank Size (Gallons)	Contents/ Description	Vessel Description	Containment	Direction of Flow	Max Discharge Rate	Overfill Protection
6			grease finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
6			grease finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
6			grease finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
6			grease finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
6			grease finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A
6			grease finished goods	portable container area	Building acts as secondary containment	Within Containment/ Building	Gradual to instantaneous	N/A

4,724,528

NOTE: Active containment measures for secondary containment employed if the model of the worst-case spill does not reach the nearest unsealed building opening (man door, garage door, rail car entry, etc.)

\*\*Can close any gaps from trench to door with bumpers, angle iron, or other material on site

\*\*Entries without a tank ID - Tank size in gallons indicates total storage for that area (drum and tote storage of final products)

Indicates vessel contains grease - is not flowable at normal temperatures.

Indicates vessels containing water-based fluids